

# Former Holloway Prison

## Planning Statement





## **Planning Statement**

### **Former Holloway Prison, Parkhurst Road, London N7 0NU**

November 2021

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**Reviewed By: Ellen Moore**

**Status: Final**

**Date: November 2021**

**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

- 1.1. This Planning Statement has been prepared on behalf of Peabody Construction Limited ('Peabody') ('the Applicant') in support of a Full Planning Application for redevelopment of land known as the Former Holloway Prison, Parkhurst Road, London, N7 0NU ('the Site').
- 1.2. The full description of the proposed development ('the development') is:
- 'Phased comprehensive redevelopment including demolition of existing structures; site preparation and enabling works; and the construction of 985 residential homes including 60 extra care homes (Use Class C3), a Women's Building (Use Class F.2) and flexible commercial floorspace (Use Class E) in buildings of up to 14 storeys in height; highways/access works; landscaping; pedestrian and cycle connections, publicly accessible park; car (blue badge) and cycle parking; and other associated works.'*
- 1.3. The Site is located on Parkhurst Road in the London Borough of Islington ('LBI'). The surrounding area is predominantly residential with a mix of uses including a library, commercial, arts and education uses on Parkhurst Road / Camden Road.
- 1.4. The Site itself comprises the Former Holloway Prison which was originally constructed in 1856 and completely rebuilt between 1971 and 1985. The Former Holloway Prison became a women's only facility in 1903 and remained as such until its closure in June 2016.
- 1.5. The proposed development comprises the demolition of existing buildings to allow for comprehensive redevelopment of the Site to provide 985 residential units, including 60 extra care homes (Use Class C3), a 1,489sqm Women's Building (Use Class F.2) and 1,822sqm of flexible commercial floorspace (Use Class E).
- 1.6. The development is arranged across 5 plots ranging in height from 1 storey to 14 storeys across the Site. At the heart of the development is a new Public Garden (a public park) which provides public open space with play space for use by the existing wider community and the future occupants of the development. The development introduces new pedestrian and cycle connections into the Site, improving the permeability of the Site and its connection to facilities within the local area.
- 1.7. The development provides 60% affordable housing provision by unit, with a tenure split of 70% social rent at Target Rent levels and 30% London Shared Ownership.
- 1.8. The development will be 'car-free' with the provision of accessible parking only. The parking will be sited along the proposed internal road. In addition, cycle parking will be provided in line with the standards in the London Plan.

1.9. We consider that the development proposal will bring a number of key public benefits as follows:

- Optimisation of the development potential of the Site in line with the NPPF and London Plan objectives;
- Redevelopment of a vacant brownfield site within a highly accessible location and residential context that would assist LBI in meeting its aspirations for redevelopment of the Site as set out in the Holloway Prison Site SPD (2018) and the emerging site allocation NH7 in the Draft LBI Local Plan (2019, as modified 2021);
- Provision of 985 new residential units (60% of which are affordable) which contributes to LBI and London-wide housing and affordable housing targets;
- Provision of extra care housing;
- Provision of 12% wheelchair housing;
- A mix of 1 to 4 bedroom homes, including 696 family homes (2+ bedroom);
- Provision of a 1,489sqm Women's Building, which exceeds the size sought in LBI's Holloway Women's Building Development Brief (June 2020);
- Provision of 1,822sqm flexible commercial floorspace, split across a range of unit sizes;
- Creation of between 46 and 269 full time equivalent (FTE) permanent jobs, subject to the end users/occupiers of the commercial units and the Women's Building, and additional jobs during the construction phase of the development;
- Provision of a new pedestrian and cycle connection to Trecastle Way;
- Improvements to the existing pedestrian crossing to Camden Road;
- The creation of landscaped publicly accessible space, including a central Public Garden, with publicly accessible play space, retained existing mature trees and new planting;
- S106 obligations including provision of 51 apprentice placements with a target for 30% of apprentices to be held by women; provision of an on-site training hub for the duration of the construction period for green skills training; provision of procurement training to help local business be 'tender ready'; and hosting of 'Meet the Buyer' events with local businesses to discuss work packages available; and
- LBI and Mayoral CIL contributions.

- 1.10. Peabody entered into a PPA with London Borough of Islington (LBI) in 2019 and has engaged in extensive pre-application advice discussions since this time. This has included discussions with a number of bodies including LBI and their appointed technical advisors, GLA, TfL, statutory consultees, and the Islington Design Review Panel. A series of public consultation events have also been held.
- 1.11. The proposed scheme has responded to comments from Officers, statutory bodies, local residents and civic societies. This is discussed further within Section 4 of this Statement and in the Design and Access Statement, prepared by AHMM Architects.
- 1.12. The proposed development accords with policies of the London Plan (2021), London Borough of Islington Core Strategy (2011), Development Management Policies (2013), and adopted Supplementary Planning Documents (SPDs), and emerging London Borough of Islington Local Plan.

### **Submission Documents**

- 1.13. This Planning Statement should be read in conjunction with the following accompanying application forms, plans, drawings and supporting documents:
- Application Form and CIL Form – prepared by Avison Young
  - Existing and Proposed Plans – prepared by AHMM
  - Proposed Landscape Plans - prepared by Exterior Architecture
  - Affordable Housing Statement – prepared by Avison Young
  - Arboricultural Impact Assessment – prepared by Barton Hyett Associates
  - Arboricultural Method Statement – prepared by Barton Hyett Associates
  - Biodiversity Net Gain Assessment – prepared by Penny Anderson
  - Circular Economy Statement – prepared by Hoare Lea
  - Construction Environmental Management Plan – prepared by London Square
  - Contamination Generic Quantitative Environmental Risk Assessment - prepared by Waterman
  - Contamination Ground Investigation Strategy and Specification- prepared by Waterman
  - Contamination Preliminary Environmental Risk Assessment - prepared by Waterman
  - Contamination Remediation Strategy - prepared by Waterman
  - Daylight and Sunlight Assessment – prepared by Point 2
  - Delivery and Servicing Plan - prepared by Velocity
  - Design and Access Statement – prepared by AHMM

- Environmental Statement – prepared by Avison Young
- Equality Impact Assessment - prepared by WSP
- Fire Statement - prepared by FDS
- Flood Risk Assessment and Drainage Report incl. Foul Drainage and Surface Water Drainage Pro-forma - prepared by Waterman
- Health Impact Assessment - prepared by WSP
- Historic Environment Assessment - prepared by MOLA
- Main Town Centre Uses Impact Assessment - prepared by WSP
- Noise Impact Assessment - prepared by Max Fordham
- Open Space and Recreation Assessment and Landscape Design Strategy - prepared by Exterior Architecture
- Parking Design and Management Plan - prepared by Velocity
- Planning Statement (incl. Social Value Self-Assessment Form) - prepared by Avison Young
- Schedules of Accommodation – prepared by AHMM
- Site Waste Management Plan - prepared by London Square
- Statement of Community Involvement - prepared by Kanda
- Sustainable Design & Construction Statement - prepared by Hoare Lea
- Transport Assessment - prepared by Velocity
- Travel Plan - prepared by Velocity
- Utilities Assessment - prepared by Hoare Lea
- Ventilation and Extract Statement - prepared by Hoare Lea
- Viability Assessment - prepared by DS2
- Waste Management Plan - prepared by WSP

1.14. The scope of the application has been agreed with LBI Planning Officers during the pre-application process.

### **Structure of the Planning Statement**

1.15. This Planning Statement is set out in the following sections:

- **Section 2** describes the Site within the immediate locational context;
- **Section 3** identifies the relevant planning history of the Site;

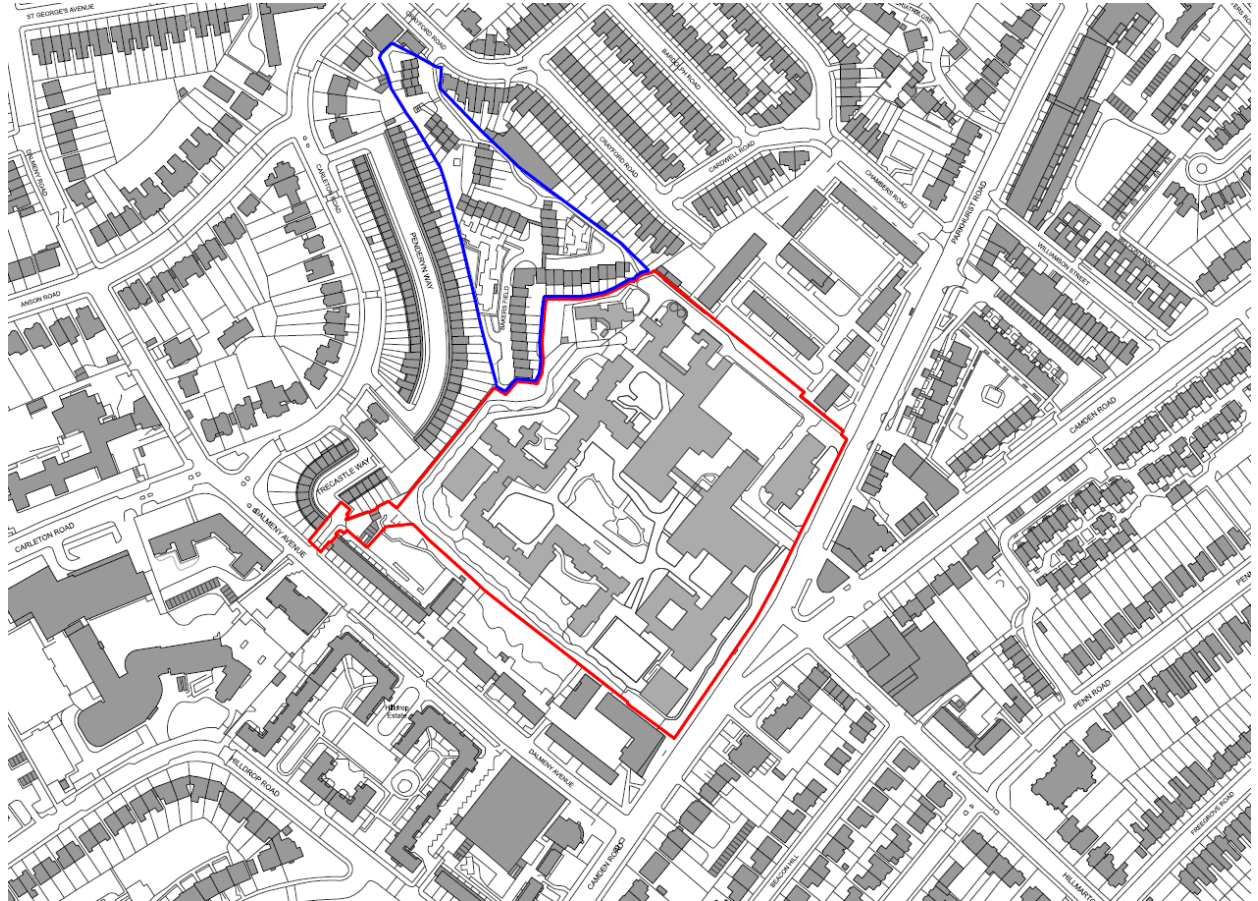


- **Section 4** discusses the pre-application consultation and design development of the proposals;
- **Section 5** sets out the development proposals in detail;
- **Section 6** identifies the relevant national, strategic and local policy context;
- **Section 7** addresses the material planning considerations of the proposal;
- **Section 8** reviews the environmental considerations; and
- **Section 9** draws together the conclusions of the report.

1.16. Any Appendices referred to in the text are contained at the end of the Statement.

## 2. Site and Surrounding Area

- 2.1. The Site is located in Islington in north-east London within St George's Ward of the London Borough of Islington. The Site fronts Parkhurst Road / Camden Road (A503) to the southeast.



**Figure 1: Site Location Plan**

- 2.2. The Site comprises an area of 4.16 hectares (ha). The Site is bound to the northeast, northwest and southwest by residential properties. To the southeast the Site is bounded by the arterial route of Parkhurst Road/Camden Road which has a mix of uses, including a library, commercial uses, arts and educational uses, and residential uses.
- 2.3. The Site itself comprises the former Her Majesty's Prison (HMP) Holloway which was constructed in 1856 and became a women's only facility in 1903. The original prison building was replaced with a new facility built between 1971 and 1985.
- 2.4. In a Ministerial Statement on the 25<sup>th</sup> November 2015, the then Lord Chancellor and Secretary of State for Justice, Michael Gove, set out plans for the closure of Holloway Prison. The statement noted the facilities at Holloway Prison were inadequate and antiquated, and set out a strategy to move prisoners to more modern facilities and a more appropriate environment at HMP Bronzefield and HMP

Downview. HMP Holloway was closed in June 2016 and the buildings have remained largely vacant since this time.

- 2.5. At present the Site is occupied by a number of buildings previously in use as prison accommodation ranging between 1 – 6 storeys in height, a visitor's centre and a series of open spaces and trees. The topography varies greatly across the Site with a level difference of approximately 8 metres between the highest point to the west and lowest point to the east.
- 2.6. Owing to the historic use of the Site, a large perimeter sinusoidal wall surrounds the Site, resulting in no secondary accesses and limited connectivity to the wider area.
- 2.7. The Site is identified on LBI Brownfield Land Register (ref TRAJ1th) for a minimum of 880 net additional dwellings.
- 2.8. The Site has a Public Transport Accessibility Level (PTAL) of 6a ('excellent') and lies within the St George's Controlled Parking Zone (CPZ) which operates from Monday to Friday 8:30am – 6:30pm.
- 2.9. There are a number of bus stops in the vicinity, including one to the south-eastern boundary of the Site, providing services to Wood Green, Hackney Central, Mornington Crescent and Trafalgar Square. There are also a number of rail stations within a 15-minute walk from the Site (Holloway Station, Caledonian Road and Tufnell Park stations). There are two existing vehicle accesses to the Site from Parkhurst Road.
- 2.10. The Site lies in Flood Zone 1 (low risk) and is at low risk of flooding from rivers and seas according to the Environment Agency's website.
- 2.11. The western portion of the Site falls within the protected viewing corridors for Local Views 4 and 5 (from Archway Road / Archway Bridge to St. Paul's Cathedral).
- 2.12. The Site does not fall within a designated conservation area and is not occupied by any statutory listed or locally listed buildings. Tufnell Park Conservation Area is located to the northwest of the Site and Hillmarton Conservation Area is located to the south.
- 2.13. The Site is not within a designated Archaeological Priority Area (APA).
- 2.14. There are a number of trees on the Site and on neighbouring land which bounds the Site, none of which are subject to a Tree Protection Order.

### 3. Planning History

- 3.1. This section includes a summary of the relevant planning history for both the application Site and surrounding area.
- 3.2. The Site was previously in use as a Her Majesty's Prison (HMP) Holloway. During the operation of the prison, there were a number of planning applications for various works associated with the use of the Site.
- 3.3. Since the closure of HMP Holloway in July 2016, two applications have been made for the temporary change of use of the existing Prison Visitors Centre to be used as a Homeless Shelter (Sui Generis). Details of these applications is set out in **Table 1**.

Reference	Description	Decision and date
P2020/0222/FUL	Temporary change of use of the existing Prison Visitors Centre (First Floor, part Ground Floor) from a use ancillary to a Prison (C2A) to a Homeless Shelter (Sui Generis), including associated works.	Granted 4th March 2020
P2019/2979/FUL	Temporary change of use of the existing Prison Visitors Centre (First Floor, part Ground Floor) from a use ancillary to a Prison (C2A) to a Homeless Shelter (Sui Generis), including associated works.	Granted 6th November 2019

**Table 1: Planning History**

- 3.4. The most recent planning permission for the temporary change of use to a homeless shelter was granted on the 4<sup>th</sup> March 2020 (P2020/0222/FUL) and permitted the use of the building as a homeless shelter (Sui Generis) until the 30<sup>th</sup> June 2021. Notwithstanding this, the use as a homeless shelter ceased in March 2020 in light of the national lockdown associated with the Covid-19 pandemic. The Site has been largely vacant since this time, with exception of on-site security and temporary uses such as filming.
- 3.5. A request for an Environmental Impact Assessment Scoping Opinion (ref: P2020/1244/EIA) was submitted in May 2020. LBI issued a Scoping Opinion on 20<sup>th</sup> July 2020. The application is accompanied by an Environmental Statement which accords with the Scoping Opinion, further details of which are included within Section 8 of this Planning Statement.

- 3.6. We have reviewed recent applications for development around the Site and a full table detailing these can be found in **Appendix I**.

## 4. Stakeholder Engagement

### London Borough of Islington

4.1. Peabody entered into a PPA with London Borough of Islington (LBI) in 2019 and has engaged in extensive pre-application discussions with Officers since this time. The meetings have covered a large number of topics, including the following:

- Principle of Development
- Density
- Layout, Height, Scale and Massing
- Affordable Housing
- Housing Mix
- Quality and Design of Residential Units
- Quality and Design of the Women's Building
- Quality and Design of Commercial Units
- Public Realm, Landscaping and Connections
- Amenity and Playspace
- Highways and Transport
- Energy and Sustainability
- S106 Head of Terms

4.2. In addition, the development has been presented to the Islington Design Review Panel on five occasions, including a presentation at the DRP Chairs Meeting in September 2021. The development design has evolved in response to the feedback from the DRP meetings and a full response to the comments raised is included in the Design and Access Statement.

4.3. The development proposals have also been presented to Members on several occasions prior to the formal submission of this planning application with dedicated sessions held on energy, sustainability and transport, and daylight and sunlight.

### GLA and TfL

4.4. The pre-application process has included pre-application meetings with the GLA and TfL. As part of these discussions, the GLA Officers confirmed strong support for the principle of residential-led mixed use redevelopment of the Site; that the layout, landscaping, height and massing, density and residential quality of the scheme was supported; and that the development would be considered eligible for the Fast Track Route. The GLA requested further details on the proposed Women's

Building, the Extra Care homes and the play space provision. These matters are addressed within this application submission.

### **Public Consultation**

- 4.5. A series of public consultation events, including workshops have been held prior to the submission of this planning application with local residents and interest groups. A full summary of the consultation feedback is provided within the Statement of Community Involvement, prepared by Kanda, which forms part of the application submission.
  
- 4.6. A summary of the consultation process and how the design has evolved over the course of the pre-application discussions in response to comments received from Officers, Members, statutory consultees, and the community is included within the Design and Access Statement that accompanies the application submission.

## 5. Proposed Development

5.1. This section of the Planning Statement sets out the proposals in greater detail. The description of the development is:

*'Phased comprehensive redevelopment including demolition of existing structures; site preparation and enabling works; and the construction of 985 residential homes including 60 extra care homes (Use Class C3), a Women's Building (Use Class F.2) and flexible commercial floorspace (Use Class E) in buildings of up to 14 storeys in height; highways/access works; landscaping; pedestrian and cycle connections, publicly accessible park; car (blue badge) and cycle parking; and other associated works.'*

5.2. Full planning permission is sought for the development.

5.3. The development is arranged across five plots (Plots A-E) around a central Public Garden (public park). Residential accommodation is located to each plot. Plot B and C also provide flexible commercial floorspace (Use Class E) which totals 1,822 sqm, and the 1,489 sqm Women's Building (Use Class F.2) is located to Plot C.

5.4. The Applicant wishes to secure the following details of the proposed quantum of development by way of planning condition. Proposed condition wording is as follows:

*The development hereby permitted shall comprise the following:*

- 985 residential units (Class C3)
- 1,489sqm Women's Building (Use Class F.2)
- 1,822sqm flexible commercial floorspace (Use Class E)'

5.5. The development will be delivered in phases as follows:

- **Phase 0** – Demolition of existing buildings and structures.
- **Phase 1** – Construction of Plot C, D and E (in sub-phases) and associated external areas, the internal access road, and circa 75% of the Public Garden.
- **Phase 2** – Construction of Plot A and associated external areas.
- **Phase 3** – Construction of Plot B and associated external areas, and the remainder of the Public Garden.



5.6. Further details of the demolition and construction programme are provided in the accompanying Construction Environmental Management Plan, prepared by London Square, which forms part of the application submission.

### Residential Units

5.7. The development provides a total of 985 residential units including 60 Extra Care units. The unit mix is as follows:

Unit Mix						
	1 bed Extra Care	1 bed	2 bed	3 bed	4 bed	Total
	Unit (%)	Unit (%)	Unit (%)	Unit (%)	Unit (%)	Unit (%)
<b>Social Rent Extra Care</b>	60 (100%)	/	/	/	/	60 (100%)
<b>Social Rent</b>	/	46 (13%)	209 (59%)	87 (24%)	13 (4%)	355 (100%)
<b>London Shared Ownership</b>	/	96 (54%)	82 (46%)	/	/	178 (100%)
<b>Market</b>	/	87 (22%)	278 (71%)	27 (7%)	/	392 (100%)
<b>Total</b>	60	229	569	114	13	985

**Table 2: Unit Mix**

5.8. The development provides 60% affordable housing (by unit), equating to 593 units. The tenure split of the affordable housing is 70% social rent (415 units), with rent set at Target Rent levels, and 30% London Shared Ownership (178 units).

5.9. The development provides 12% wheelchair homes (120 units), designed in accordance with Building Regulations Part M4(3). These units are located within each plot. The social rent wheelchair units will be delivered as M4(3)(2)(b) 'wheelchair accessible units'. The London Shared Ownership and market wheelchair units will be delivered as M4(3)(2)(a) 'wheelchair adaptable units'. The tenure split for the wheelchair homes is as follows:

Wheelchair Unit Mix					
	1 bed Extra Care	1 bed	2 bed	3 bed	4 bed
	Unit	Unit	Unit	Unit	Unit
<b>Social Rent</b>	60	1	10	14	4
<b>London Shared Ownership</b>	/	4	7	/	/
<b>Market</b>	/	3	16	1	/
<b>Total</b>	60	8	33	15	4

**Table 3: Wheelchair Unit Mix**

5.10. Each residential unit meets or exceeds the minimum space standards and is served by private amenity space in the form of either a private garden, terrace or balcony which meet London Plan and LBI adopted and emerging standards. A series of communal spaces are proposed across the development, at ground, podium or roof level and will be accessible to the future residents of the relevant building to which they serve.

5.11. The provision of dual aspect accommodation has been maximised across the development, with 94% dual aspect units comprised of corner aspect and stepped/double aspect which provide windows at 90 degrees on two external walls, allowing future occupants views in two different directions. The provision of dual aspect accommodation is as follows:

Aspect		
	Unit	Percentage (%)
<b>Dual Aspect, comprising:</b>	925	94%
<i>Through Aspect</i>	0	
<i>Corner Aspect</i>	484 (52%)	
<i>Stepped / Double Aspect</i>	441 (48%)	
<b>Single Aspect</b>	60	6%
<b>Total</b>	985	100%

**Table 4: Aspect**

5.12. Communal resident facilities and staff facilities are provided to the ground floor of Plot E, Building E1 to serve the Extra Care units within this building.

- 5.13. The development provides 1,334 sqm of residents' facilities, including a concierge, split across the lower and upper ground floors of Plot D, fronting the Public Garden. These facilities will be available to all future residents of the development.

### **Women's Building**

- 5.14. The development provides a 1,489sqm Women's Building (Use Class F.2) split across the lower and upper ground floors of Plot C, fronting Parkhurst Road. The Women's Building provides an active frontage on Parkhurst Road and Plot C has been designed to provide a celebratory, open and inviting frontage. Internally, the Women's Building has been designed flexibly to enable the space to meet the needs of future operators. Indicative internal layouts are shown in the Design and Access Statement, prepared by AHMM Architects which accompanies this application submission. The Women's Building is served by a dedicated and secure garden.

### **Commercial Floorspace**

- 5.15. The development provides 1,822sqm of flexible commercial floorspace (Use Class E) located to the lower and upper ground floors of Plot B fronting Parkhurst Road, and the ground floor of Plot C fronting the Public Garden. The commercial floorspace is split across a range of unit sizes.
- 5.16. The Plot B commercial floorspace provides an active frontage to Parkhurst Road, complementing the active frontage provided by the Women's Building, located to Plot C.
- 5.17. The commercial unit to Plot C fronts the Public Garden and provides activation to the public open space, complementing the active frontage provided by the residents' facilities located to the ground floor of Plot D.

### **Public Open Space and Landscaping**

- 5.18. The development provides 10,480sqm of public open space which will be publicly accessible for future occupants of the development and the wider community. The majority of the public open space is formed of the central Public Garden (public park) and the nature garden, sited to the northwest of Plot A. Play space is provided within the public open space for all age groups.
- 5.19. Extensive landscaping is proposed across the development, which includes the retention of 29 trees and 3 tree groups, and the introduction of 364 new trees with further soft landscaping, designed to enhance the ecological value of the Site and provide attractive public realm. Green and brown roofs are proposed. Details of the landscaping scheme is set out in the Open Space and Recreation Assessment and Landscape Design Strategy prepared by Exterior Architecture, which accompanies this application submission.

## **Connections**

- 5.20. Pedestrian, cyclist and vehicular accesses are proposed from Camden/Parkhurst Road.
- 5.21. The development provides a ramped and stepped connection from the Site to Trecastle Way to the west. The connection is designed for use by pedestrian and cyclists and will be publicly accessible.
- 5.22. There is an existing gated connection from the Site onto the Bakersfield Estate to the north. The development maintains this route to the point of the Site boundary.
- 5.23. The development has also been designed to facilitate a future connection through the Holloway Estate and onto Crayford Road.
- 5.24. The development will secure improvements to the existing pedestrian crossing to Camden/Parkhurst Road.

## **Car and Cycle Parking**

- 5.25. The development will be 'car-free' with the provision of 30 accessible 'Blue Badge' car parking spaces only. The parking will be sited along the proposed internal road. Each parking space will have active electric vehicle charging capacity.
- 5.26. Short and long stay cycle parking will be provided for each use in accordance with the standards in the London Plan and LBI's emerging Local Plan.

## **Servicing**

- 5.27. Deliveries and servicing will take place from the internal road. Waste stores are located within each plot and within an appropriate distance to enable collection. Plot A and B include under podium servicing areas which will be accessed by refuse vehicles.
- 5.28. The development provides appropriate means of access for emergency vehicles including fire tenders.

## **Energy and Sustainability**

- 5.29. The development will provide a site-wide communal low-temperature heat network and the proposed energy strategy comprises Air Source Heat Pumps with photovoltaic panels accommodated at roof level.
- 5.30. Full details of the development are set out in the Design and Access Statement prepared by AHMM Architects which accompanies the application submission.

## 6. Planning Policy

6.1 This section of the Planning Statement summarises the relevant planning policy context which the planning application will be determined.

6.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) makes it clear that 'if regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material consideration indicate otherwise'.

6.3 The development plan for LBI comprises:

- London Plan (2021);
- LBI Core Strategy (2011);
- LBI Development Management Policies Development Planning Document (DPD) (2013); and
- LBI Local Plan Policies Map (2013).

6.4 Other material considerations are:

- National Planning Policy Framework (NPPF) (July 2021)
- LBI Holloway Prison Site SPD (2018)
- LBI Development Viability SPD (2016)
- LBI Environmental Design SPD (2012)
- LBI Inclusive Design SPD (2014)
- LBI Islington Urban Design Guide SPD (2017)
- LBI Location and Concentration of Uses SPD (2016)
- LBI Planning Obligations (Section 106) SPD (2016)
- LBI Streetbook SPD (2012)
- Mayor's Character and Context SPG (2014)
- Mayor's Accessible London: Achieving an Inclusive Environment SPG (2014)
- Mayor's the Control Of Dust And Emissions During Construction And Demolition SPG (2014)
- Mayor's Housing SPG (2016)

- Mayor's Play and Informal Recreation SPG (2012)
- Mayor's Homes for Londoners Affordable Housing and Viability SPG (2017)
- Mayor's Planning for Equality and Diversity in London SPG (2007)
- GLA Guidance on Preparing Energy Assessments (2018)

6.5 The Site is identified on Islington's Brownfield Land Register as follows:

Site Reference: TRAJ1

Site Name and Address: Holloway Prison, Parkhurst Road

Size: 3.99 ha

Minimum Net Dwellings: 880

### **The Current Adopted Development Plan**

#### **London Plan (2021)**

6.6 The London Plan was adopted in March 2021 and provides the strategic planning policies for London, setting out an integrated economic, environmental, transport and social framework for growth over the next 20-25 years. The development has been considered against all relevant policies within the London Plan and this is set out in a matrix in Appendix II of this Statement.

#### **LBI Core Strategy (2011) and LBI Development Management Policies DPD (2013)**

6.7 The LBI Core Strategy (2011) and LBI Development Management Policies DPD (2013) are the key strategic and statutory planning documents for LBI and will guide decisions about the developments that will take place in the borough over a 15 year period to 2025.

6.8 The development has been considered against all relevant policies within the Core Strategy (2011) and Development Management Policies DPD (2013) and this is set out in a matrix in Appendix III of this Statement.

#### **LBI Policies Map (2013)**

6.9 LBI Policies Map has been accessed and an excerpt has been included below in **Figure 2**. The western portion of the Site falls within the protected viewing corridors for Local View LV4 (from Archway Road to St. Paul's Cathedral) and Local View LV5 (from Archway Bridge to St. Paul's Cathedral).





**Figure 2: Extract of LBI Policies Map (2013)**

### **Other Material Considerations**

#### **National Planning Policy Framework (NPPF)**

- 6.10 The National Planning Policy Framework (NPPF) was published by the Government on 21st July 2021. It sets out the Government's national policy for planning issues in a single, comprehensive document.
- 6.11 The NPPF states that the purpose of the planning system is to contribute to and aid in the achievement of sustainable development. The NPPF asserts that the planning system should carry a "presumption in favour of sustainable development" – a "golden thread" running through the creation of development plans and in the decisions taken by local planning authorities when determining planning applications.
- 6.12 Paragraph 8 sets out the three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the objectives): economic (to help build a strong, responsive, and competitive economy); social (to support strong, vibrant, and healthy community); and environmental (to protect and enhance our natural, built, and historic environment).
- 6.13 Paragraph 38 confirms that local planning authorities should approach decision on proposed development in a positive and creative way. Furthermore, decision-makers at every level should seek to approve applications for sustainable development where possible.

**Mayor's Housing SPG (2016)**

- 6.14 The Mayoral Housing SPG provides guidance on the implementation of housing policies in the London Plan and sets out a series of design standards. The development has been considered against all relevant standards within the Housing SPG (2016) and this is set out in a matrix in Appendix IV of this Statement.

**Mayors Social Infrastructure SPG (2015)**

- 6.15 The SPG provides guidance to promote the delivery of infrastructure that is well phased and located to meet identified need. As the SPG identifies, one way of achieving this is through the collocation of social infrastructure facilities with each other and with housing development so that housing and social infrastructure needs can help to be met at the same time.

**Mayors Accessible London: Achieving an Inclusive Environment SPG (2014)**

- 6.16 The SPG provides guidance on implementing inclusive design principles effectively and on creating an accessible environment in London, with particular emphasis on the access requirements of disabled and older people.

**Mayors Control of Dust and Emissions during Construction and Demolition SPG (2014)**

- 6.17 This SPG seeks to reduce emissions of dust, PM10 and PM2.5 from construction and demolition activities in London. It also aims to manage emissions of nitrogen oxides (NOx) from construction and demolition machinery by means of a new non-road mobile machinery Ultra Low Emissions Zone (ULEZ). In addition, this document provides more detailed guidance on the implementation of all relevant policies in the London Plan and the Mayor's Air Quality Strategy to neighbourhoods, boroughs, developers, architects, consultants and any other parties involved in any aspect of the demolition and construction process.

**Mayors Character and Context SPG (2014)**

- 6.18 The SPG identifies that planning for neighbourhoods in a city as dynamic and diverse as London can be a challenge. There is a balance to be struck between change and preservation, accommodating growth and protecting the things that people value. Getting an understanding of a place's character and context can ensure that development can make a real contribution to its place and its people. The SPG sets out a process for acquiring this knowledge, so that change is brought about in a way which is responsive to individual places and locations.



**Mayors Play and Informal Recreation SPG (2012)**

- 6.19 The SPG proposes benchmark standards for play space that are flexible enough to meet the varying needs of children and young people across London. In addition to the SPG, the adjoining play space calculation spreadsheet provides further guidance on how much play space development proposals can be expected to provide. This spreadsheet is indicative and boroughs are able to supplement them or use their own calculation method, based on locally-derived evidence and data.

**Mayors Planning for Equality and Diversity in London (2007)**

- 6.20 The SPG sets out some of the overarching principles that should guide planning for equality in the London context and also explores how the key spatial planning issues can impact upon equality and diversity. The SPG also examines the specific spatial needs of each of the target equality groups identified in the London Plan, and provides detailed guidance on how planning policies and proposals can be used to address them.

**Mayors Affordable Housing and Viability SPG (2017)**

- 6.21 The adopted Affordable Housing and Viability SPG seeks to speed up planning decisions and increase the amount of affordable housing delivered through the planning system. The document introduces the Fast-Track Route for schemes delivering more than 35% affordable housing (or 50% on public land) and outlines the Viability Tested Route (including Early Stage and Late-Stage Viability Reviews) for schemes which do not meet the target.

**Mayors 'Be Seen' Energy Monitoring Guidance (2021)**

- 6.22 This guidance explains the process that needs to be followed to comply with the 'be seen' post-construction monitoring requirement of Policy SI2 of the London Plan. The 'Be seen' energy monitoring guidance requires the reporting of energy performance data as a scheme is planned, built out and in use.

**Holloway Prison Site SPD (2018)**

- 6.23 LBI adopted the SPD in 2018 which set out a series of objectives for the Site. The SPD was supported by a Holloway Prison Site Capacity Study (2017) and Viability Assessment of Development Scenarios (2017).
- 6.24 The development has been considered against all relevant objectives within the SPD and this is set out in a matrix in Appendix VI of this Statement.

## Other LBI Supplementary Planning Documents

6.25 LBI has adopted a series of SPD's, as follows, which have been taken into consideration in the preparation of the application submission:

- LBI Development Viability SPD (2016)
- LBI Environmental Design SPD (2012)
- LBI Inclusive Design SPD (2014)
- LBI Islington Urban Design Guide SPD (2017)
- LBI Location and Concentration of Uses SPD (2016)
- LBI Planning Obligations (Section 106) SPD (2016)
- LBI Streetbook SPD (2012)

## Emerging Policy Context

### Mayor's Guidance

6.26 The Applicant is also aware that the following guidance has been consulted on and whilst not yet adopted by the Mayor, has borne the direction of these document in mind when preparing this planning application:

- Good Quality Homes for all Londoners (Consultation Draft) (2020), specifically Module C – which is covered in Appendix III of this document. The development has been considered against all relevant standards and this is set out in a matrix in Appendix V of this Statement.
- Circular Economy Statements (Consultation Draft) (2020)
- Whole-life Carbon Assessments (Consultation Draft) (2020)
- Air Quality Positive (Pre-consultation Draft) (2021)
- Urban Greening Factor (UGF) (Consultation Draft) (2021)

### LBI

6.27 LBI is currently preparing a new Local Plan. The Council submitted the Draft Islington Local Plan to the Secretary of State on 12<sup>th</sup> February 2020 for examination. Examination in Public took place in September to October 2021. Once the Islington Local Plan has been adopted, it will form part of the Development Plan for Islington and will replace the existing Local Plan (Core Strategy 2011,

Development Management Policies DPD 2013 and Policies Map 2013) in its entirety. The Draft Local Plan comprises the following:

- Draft Islington Local Plan Strategic and Development Management Policies (September 2019) with Modifications for Consultation (March 2021) ('Draft Local Plan 2019, as modified 2021')
- Draft Islington Local Plan Site Allocations (September 2019) with Modifications for Consultation (March 2021) ('Draft Site Allocations 2019, as modified 2021')
- Draft Islington Local Plan Policies Map (September 2019) with Post Submission Policies Map Changes (January 2021) ('Draft Policies Map 2019, as modified 2021')

6.28 As the Draft Local Plan is at an advanced stage, the draft policies are afforded moderate weight in the consideration of applications, where there are not outstanding objections to policies. However, substantial weight cannot be afforded to the policies until receipt of the Inspectors' Report.

6.29 The Site is subject to an emerging site allocation in the Draft Site Allocations (2019, as modified 2021) for '*Residential-led development with community uses (including a women's centre building), open space and an energy centre*' (ref NH7).

6.30 Draft Local Plan Spatial Policy 5 (part E) sets out the following in relation to the Site:

*The Holloway Prison site is a key local housing site which will help to meet identified housing need in the borough. The site will provide, inter alia, high levels of genuinely affordable housing, community uses including a women's building/centre and publicly accessible open green space'.*

6.31 Both the emerging site allocation and draft Local Plan Policy SP5 carry forward the overall development aspirations of the adopted Holloway Prison Site SPD.

6.32 On review of the Draft Islington Local Plan Policies Map (extract in **Figure 3**), the Site is the subject of a site allocation as detailed above.



**Figure 3: LBI Emerging Policies Map Extract**

- 6.33 The western portion of the Site falls within the protected viewing corridors for Local View LV4 (from Archway Road to St. Paul’s Cathedral) and Local View LV5 (from Archway Bridge to St. Paul’s Cathedral).
- 6.34 The planning application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment which fully assesses the impact of the development on the local views.
- 6.35 The development has been considered against all relevant policies within the Draft Local Plan (2019, as modified 2021) and this is set out in a matrix in Appendix III of this Statement.

## 7. Planning Considerations

7.1. The development has been assessed against the Development Plan. The key planning considerations in assessing the development are as follows:

- Benefits of the Proposed Development
- Principle of Development
- Density and Site Capacity
- Design - Layout, Height, Scale and Massing
- Affordable Housing
- Housing Mix
- Quality and Design of Residential Units (residential & extra care homes)
- Quality and Design of Women's Building (incl. assessment of Draft Local Plan Policy SC1)
- Quality and Design of Commercial Units
- Public Realm and Landscaping
- Public Open Space
- Amenity and Playspace
- Highways and Transport
- Energy and Sustainability
- Ecology and Trees
- Heritage and Townscape
- Archaeology
- Flooding
- Fire
- Planning Obligations

- CIL

7.2. The development has been considered against all relevant policies and standards within the following adopted and emerging policy documents and this is set out in a series of matrices which are appended to this Statement:

- London Plan (2021)
- LBI Core Strategy (2011) and LBI Development Management Policies DPD (2013)
- Draft Islington Local Plan (2019, as modified 2021)
- Holloway Prison Site SPD (2018)
- Mayor's Housing SPG (2016)
- Mayor's Draft Good Quality Homes for all Londoners (Consultation Draft) (2020) Module C

### **Benefits of the Proposed Development**

7.3. We consider that the development proposal will bring a number of key public benefits as follows:

- Optimisation of the development potential of the Site in line with the NPPF and London Plan objectives;
- Redevelopment of a vacant brownfield site within a highly accessible location and residential context that would assist LBI in meeting its aspirations for redevelopment of the Site as set out in the Holloway Prison Site SPD (2018) and the emerging site allocation NH7 in the Draft LBI Local Plan (2019, as modified 2021);
- Provision of 985 new residential units (60% of which are affordable) which contributes to LBI and London-wide housing and affordable housing targets;
- Provision of extra care housing;
- Provision of 12% wheelchair housing;
- A mix of 1 to 4 bedroom homes, including 696 family homes (2+ bedroom);
- Provision of a 1,489sqm Women's Building, which exceeds the size sought in LBI's Holloway Women's Building Development Brief (June 2020);
- Provision of 1,822sqm flexible commercial floorspace, split across a range of unit sizes;

- Creation of between 46 and 269 full time equivalent (FTE) permanent jobs, subject to the end users/occupiers of the commercial units and the Women's Building, and additional jobs during the construction phase of the development;
- Provision of a new pedestrian and cycle connection to Trecastle Way;
- Improvements to the existing pedestrian crossing to Camden Road;
- The creation of landscaped publicly accessible space, including a central Public Garden, with publicly accessible play space, retained existing mature trees and new planting;
- S106 obligations including provision of 51 apprentice placements with a target for 30% of apprentices to be held by women; provision of an on-site training hub for the duration of the construction period for green skills training; provision of procurement training to help local business be 'tender ready'; and hosting of 'Meet the Buyer' events with local businesses to discuss work packages available; and
- LBI and Mayoral CIL contributions.

### **Principle of Development**

#### Loss of Existing Use

- 7.4. The development comprises the demolition of the existing buildings which make up the former Holloway Prison and garages to the west which lead onto Trecastle Way. The lawful use of the Prison is C2A (Secure Residential Institution).
- 7.5. In a Ministerial Statement on the 25<sup>th</sup> November 2015, the then Lord Chancellor and Secretary of State for Justice, Michael Gove, set out plans for the closure of Holloway Prison as it was no longer required to serve the needs of the national criminal justice service. The Statement noted the facilities at Holloway Prison were inadequate and antiquated, and set out a strategy to move prisoners to more modern facilities and a more appropriate environment at HMP Bronzefield and HMP Downview. HMP Holloway was closed in June 2016 and the buildings have remained largely vacant since this time, with exception of on-site security and temporary uses such as filming.
- 7.6. While operational, the Prison provided ancillary services on-site for the occupants of the prison. These ancillary services ceased on-site upon the Prison being made vacant, and no further social or community uses have taken place.



- 7.7. The general thrust of the national, regional, and local policies seeks to secure sustainable patterns of development, the reuse of previously developed urban land, and in particular, the optimisation of well-connected development sites. This objective is the common thread running through the 'Framework' and features prominently in the policies contained in the London Plan (2021) and LBI's adopted Core Strategy (2011) and Development Management Policies DPD (2013), and draft Local Plan (2019, as modified 2021).
- 7.8. The Holloway Prison Site SPD (2018) refers to the prison as social infrastructure. The Development Management Policies DPD defines social infrastructure as community spaces/facilities, emergency services and education facilities, noting it includes facilities defined as community and social facilities. The Development Management Policies DPD defines community and social facilities as facilities that are available to, and serve the needs of, local communities and others and are often funded in some way by a grant or investment from a government department or public body or the voluntary sector. Social and community facilities are comprised of buildings and external spaces. They include buildings which accommodate social services such as day-care centres, luncheon clubs, and drop-in centres. Other facilities include education and training facilities including early years providers, schools, colleges and universities, health facilities, youth centres, libraries, community meeting facilities, community halls and policing facilities. The social and community facilities are generally in Use Classes C2, D1, D2 and possibly some Sui Generis uses. This definition is carried forward in the Draft Local Plan. Development Management Policies DPD Policy DM4.12 Part A(i) states the Council will not permit any loss or reduction in social infrastructure uses unless a replacement facility is provided on site which would, in the council's view, meet the need of the local population for the specific use. Draft Local Plan Policy SC1 Part D(i) states the Council will not permit any loss or reduction in social infrastructure uses unless a replacement facility is provided on site. The draft Policy goes on to state that any facility must be of at least equivalent quality, quantity and accessibility to that of the existing facility, and must be consistent with Part G. It must, in the Council's view, ensure that the needs of the local population will continue to be met to at least the same level as the existing use.
- 7.9. The Holloway Prison Site SPD seeks a Women's Building as part of the redevelopment of the Site that incorporates safe space to support women in the criminal justice system and services for women. This is carried forward into the emerging allocation for the Site in the Draft Local Plan. Neither the SPD nor Draft Local Plan specify a minimum or maximum required size for the facility. LBI published a draft Women's Building Development Brief in June 2020 which sought a facility of between 800sqm to 1,200sqm.
- 7.10. The development exceeds the range set out in the draft Women's Building Development Brief (June 2020) and includes the provision of a 1,489sqm Women's Building located to Plot C. The facility



incorporates safe space to support women in the criminal justice system and services for women. This accords with Development Management Policies DPD Policy DM4.12 Part A(i), the Holloway Prison Site SPD, and the emerging allocation. Draft Local Plan Policy SC1 Part D(i) requires criteria in Part G of the Draft Policy to be met. Each criterion is satisfied as follows and the development accords with Draft Local Plan Policy SC1.

- The Women's Building is located in an area convenient for the community it will service and is accessible by a range of sustainable transport modes, including walking, cycling and public transport. This satisfies Part G(i).
- The Women's Building is inclusive, accessible, flexible, sustainable and provides design and space standards which meet the needs of intended occupants. This satisfies Part G(ii).
- Given the highly accessible nature of the Site to public transport, the development is 'car free', with the exception of accessible spaces to serve the residential element of the development. A series of loading bays are provided across the development which could be utilised for drop-off/pick-up facilities for disabled people should the Council consider this necessary. This satisfies Part G(iii).
- The Women's Building has been sited to maximise use of the facility. The final operator/s of the Women's Building has not yet been determined but it may be shared by multiple women's services providers. Given the nature of the facility there is limited scope for sport and recreation, however opportunities for these activities is provided in the publicly accessible Public Garden. This satisfies Part G(iv).
- The Women's Building complements existing uses and the character of the area, and avoids adverse impacts on the amenity of surrounding uses. This satisfies Part G(v).

7.11. With respect to the garages, the demolition will enable delivery of a pedestrian and cycle connection to Trecastle Way, providing permeability through the Site in accordance with the objectives of the Holloway Prison Site SPD, a public benefit for the wider community and the future occupants on the Site. The garages are in the ownership of LBI, and it is understood that the Council will facilitate provision of this area of the Site to the Applicant for development, with suitable mitigation provided to the existing users if necessary. The loss of these garages to enable delivery of the connection which is a public benefit is therefore considered appropriate.

### Principle of Residential Development

- 7.12. At the heart of the NPPF (2021) is a presumption in favour of sustainable development. This means that development proposals that accord with the development plan should be approved without delay (Para 11c). It is considered that the development should benefit from this presumption in favour of sustainable development insofar as it accords with national, regional and local planning policy requirements to optimise the use of brownfield locations for the delivery of a mix of uses including residential dwellings.
- 7.13. Para 119 of the NPPF is clear that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 7.14. The Site is previously developed, underused and located in an area which is subject to significant housing need. As such, the principle of redeveloping this Site for residential-led mixed use development is firmly supported by the provisions of the NPPF.
- 7.15. London Plan Policy H1 sets out the ten-year housing target for Islington as 7,750 homes to be delivered between 2019/2020 – 2028/29. This includes the requirement to optimise the potential for housing delivery on all suitable and available brownfield sites including ones with high public transport access levels and the redevelopment of surplus public owned sites.
- 7.16. Policy H1 also states that Boroughs should proactively use brownfield registers to increase planning certainty for those wishing to build new homes. Accordingly, the Site is identified on Islington's Brownfield Land Register for a minimum of 880 new homes.
- 7.17. The ten-year housing target from the London Plan Policy is reflected in Draft Local Plan Policy H2 and equates to an annualised target of 775 per annum.
- 7.18. The Holloway Prison Site SPD seeks the provision of housing on the Site. In addition, the Site is subject of a draft allocation in the Draft Site Allocations (2019, as modified 2021) for:
- 'Residential-led development with community uses (including a women's centre building), open space and an energy centre'.*
- 7.19. Neither the Holloway Prison Site SPD nor the draft allocation specify a minimum or maximum required quantum of units.

- 7.20. The development provides 985 residential units, of which 60% are affordable, representing a significant contribution to housing delivery and affordable housing delivery in the Borough. As LBI's ten-year housing target is 7,750 homes, the development equates to 1.27 years' worth of housing supply.
- 7.21. The principle of residential development on the Site is established by the current and emerging development plan, and the proposed quantum of residential units is also considered to be firmly supported by planning policies operating at all levels.

#### Principle of Extra Care Homes

- 7.22. London Plan Policy H13 relates to specialist older persons housing and sets out that boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing.
- 7.23. Core Strategy Policy CS12 states the Council provide more high quality, inclusive and affordable homes and this will support the aim of retaining older residents alongside meeting the pressing need for more social-rented housing. Development Management Policies DPD Policy DM3.8 states the Council will support the provision of sheltered housing and care homes, and the supporting text clarifies that this Policy is applicable to all homes designed for older, disabled or other vulnerable people, falling within Use Classes C2 and C3. This would include Extra Care homes within Use Class C3.
- 7.24. Draft Local Plan Policy H7 sets out that there is local need for affordable one and two-bed extra care units and this specific type of accommodation may be on certain schemes where the Council's Adult Social Care service considered that this would meet a defined need.
- 7.25. During the course of pre-application discussions, the Council requested the provision of 60 Extra Care homes within the development to cater for an identified need within the borough. In accordance with this request, the development provides 60 Extra Care homes within Plot E.
- 7.26. The principle of Extra Care homes is therefore supported by current and emerging policy and has been specifically sought by the Council to meet an identified need. It is anticipated that occupation of the units will be by existing LBI residents that will be likely to be downsizing from larger properties thus having the additional benefit of freeing up larger units in the borough for family occupation.
- 7.27. These homes meet all other relevant policy criteria, as demonstrated within the matrices appended to this Statement, and therefore fully comply with London Plan Policy H13, Core Strategy Policy CS12, Development Management Policies DPD Policy DM3.8 and Draft Local Plan Policy H7.

### Principle of Commercial Use

- 7.28. Development Management Policies DPD Policy DM4.4 sets out that out-of-centre sites are acceptable for A, D2 Use Classes and Sui Generis main Town Centre uses where the development would not have a detrimental impact on the vitality and viability of town centres and would be accessible to all by sustainable forms of transport.
- 7.29. The Holloway Prison Site SPD seeks active uses along Parkhurst Road and Camden Road and notes that this could include retail provision. The SPD does not specify a minimum or maximum quantum of floorspace for this use.
- 7.30. Draft Local Plan Policy R3 states that any proposal for main town centre uses must meet the sequential test and provide a detailed impact assessment which determines whether there would be likely significant adverse impacts on relevant Town Centres and/or Local Shopping Areas.
- 7.31. The development provides 1,822sqm of flexible commercial floorspace (Use Class E) located to the lower and upper ground floors of Plot B fronting Parkhurst Road, and the ground floor of Plot C fronting the Public Garden. The commercial floorspace is split across a range of unit sizes. The commercial floorspace will provide ground floor activation to Parkhurst Road in accordance with the Holloway Prison Site SPD. It is anticipated that the commercial floorspace will come forward as provision which meets the everyday and essential shopping and service needs of the new resident population.
- 7.32. As the Site is not located within a town centre, the planning application is accompanied by a Main Town Centre Uses Assessment prepared by WSP. The scope of this Assessment was agreed with LBI at pre-application stage. The Assessment confirms there are no sequentially preferable sites which can appropriately accommodate the proposed floorspace and meet the same needs as the development. Further, the development will not result in significant adverse impact on the vitality and viability of any existing, planned or committed centres within the catchment.
- 7.33. The development satisfies the sequential assessment, and therefore accords with Development Management Policies DPD Policy DM4.4 and Draft Local Plan Policy R3. The provision of flexible commercial space also accords with the objectives of the Holloway Prison Site SPD. The principle of commercial floorspace is therefore established.

### Principle of Women's Building

- 7.34. London Plan Policy S1 sets out that development proposals that provide high quality, inclusive social infrastructure that address a local or strategic need and support service delivery strategies should be supported.
- 7.35. Development Management Policies DPD Policy DM4.12 sets out that the Council will seek the provision of new social infrastructure and cultural facilities as part of large mixed-use developments.
- 7.36. This is carried forward in the Draft Local Plan Policy SC1 setting out that the Council will support proposals to provide new social and community infrastructure facilities.
- 7.37. The Holloway Prison Site SPD seeks a Women's Building as part of the redevelopment of the Site that incorporates safe space to support women in the criminal justice system and services for women. This is carried forward into the emerging allocation for the Site in the Draft Local Plan. Neither the SPD nor Draft Local Plan specify a minimum or maximum required size for the facility. LBI published a draft Women's Building Development Brief in June 2020 which sought a facility of between 800sqm to 1,200sqm.
- 7.38. The development includes the provision a 1,489sqm Women's Building located to Plot C. The facility incorporates safe space to support women in the criminal justice system and services for women. This accords with Development Management Policies DPD Policy DM4.12, the Holloway Prison Site SPD, and the emerging allocation. The Women's Building provides an active frontage on Parkhurst Road and Plot C has been designed to provide a celebratory, open and inviting frontage. Internally, the Women's Building has been designed flexibly to enable the space to meet the needs of future operators. Indicative internal layouts are shown in the Design and Access Statement, prepared by AHMM Architects which accompanies this application submission. The Women's Building is served by a dedicated and secure garden.
- 7.39. The Women's Building satisfies all other relevant policy criteria, as demonstrated within the matrices appended to this Statement, and therefore fully comply with London Plan Policy S1, Development Management Policies DPD Policy DM4.12, Holloway Prison Site SPD and Draft Local Plan Policy SC1.

### **Density and Site Capacity**

- 7.40. Chapter 11 of the NPPF sets out that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 120 goes on to state that decisions should

promote and support the development of under-utilised land, especially if this would help to meet identified needs for housing where land supply is constrained.

- 7.41. Core Strategy Policy CS12 refers to residential developments following and not exceeding the densities level set in the London Plan. This Policy was adopted at the time the London Plan 2008 was in place. The current London Plan does not specify a numeric density guide as the previous iterations of the document did. Policy GG2 seeks to make the best use of land by supporting the intensification of land to support additional homes and workspace, promoting high-density development, particularly in location that are well-connect to jobs, services, infrastructure, and amenity by public transport, walking and cycling and that a design-led approach should determine the optimum development capacity of a site.
- 7.42. This is plainly to be considered alongside the requirement to demonstrate a high-quality development which ensures access to services for future residents, provides residential quality and compliance with the Mayors housing standards, housing mix, quality and quantum of play and amenity space, public realm, environmental performance and contribution to local place making. Policy D3 builds upon this and requires the optimisation of site capacity through a design-led approach.
- 7.43. Draft Local Plan Policy H1 states that Islington supports high density housing development and that proposals for housing must make more efficient use of land to ensure that the optimal amount of housing is delivered.
- 7.44. Draft Local Plan Policy PLAN 1 sets out that all development must follow 4 design principles; contextual, connected, inclusive and sustainable. The first principle requires all development to make efficient use of sites by responding to and enhancing the existing site context and ensuring the development capacity of the site is fully realised.
- 7.45. The development will make the best use of this highly accessible, vacant, public sector brownfield Site and has followed an iterative design-led process which has informed the quantum of development. London Plan Policy H4 identifies surplus public sector land as being an important source of capacity where housing delivery should be optimised. The development accords with this and provides 985 residential units, including 60 extra care homes, a 1,489sqm Women's Building and 1,822sqm of commercial floorspace. This quantum accords with the Brownfield Land Register which sets out that the Site has a minimum capacity of 880 new homes. The development has been sensitively designed to respond to the surrounding local context and site constraints, whilst also protecting the amenity of neighbouring properties and providing a high level of living accommodation for future residents.

- 7.46. Although the London Plan omits any reference to the previously adopted density matrix, as a comparison piece (and using the prescribed Maccreeanor Lavington approach in the Housing SPG), the density of the development is set out below.

Calculation of density	
Site Area	4.16 ha
Site Area (Pro-rata) whereby 96.7% of the proposed built development is residential	4.02 ha
Units	985
Habitable rooms	2,900
Units per hectare	245 u/ha
Habitable rooms per hectare	721 hr/ha

**Table 5: Density of the development**

- 7.47. For sites in an urban location with a PTAL of between 4 and 6, the previous London Plan suggested a guide of up to 260 units per hectare and 700 habitable rooms per hectare. The development has a density of 245 units per hectare, within the guide figure in the matrix, and 721 habitable rooms per hectare, marginally higher than the guide figure in the matrix. The Housing SPG is clear that the matrix should not be applied mechanistically and that it should be considered alongside dwelling mix, environmental and social infrastructure, the need for other land uses (eg employment or commercial floorspace), local character and context, together with other local circumstances, such as improvements to public transport capacity and accessibility. It is noted that the development provides 114 no. 3-bed and 13 no. 4-bed homes, and the typology for these larger homes predominantly includes a standalone kitchen which is counted as a separate habitable room in addition to the living/diner space, which artificially inflates the number of habitable rooms in the development.
- 7.48. Taken in the round, with due regard to the appropriate dwelling mix, the design of the development, the access to services and the contribution to place shaping through form and layout, its quality and character, the development will provide a high-quality scheme, which strikes a balance between seeking to make the best use of this underused land, whilst responding to and respecting the scale, function and context of the surrounding context.
- 7.49. Given the Site's accessible location and with regard to the emerging allocation, the development plainly optimises the site capacity and makes the best use of land, in accordance London Plan Policy GG2, D3, and H4, and Draft Local Plan Policy H1 and PLAN 1.

## Design – Layout, Height, Scale and Massing

- 7.50. The NPPF (Section 12) states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Paragraph 134 of the NPPF emphasises how significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings. The National Design Guide (2021) sets out ten characteristics of beautiful, enduring and successful places, comprising: context; identity; built form; movement; nature; public spaces; uses; homes and buildings; resources; and lifespan.
- 7.51. London Plan Policy GG1 sets out that development should help deliver strong and inclusive communities by ensuring new buildings and spaces are designed to reinforce or enhance the identity, legibility, permeability and inclusivity of neighbourhoods.
- 7.52. Development Management Policies DPD Policy DM2.1 states that all forms of development are required to be of high quality, incorporate inclusive design principles and make a positive contribution to the local character and distinctiveness of an area, based upon an understanding and evaluation of its defining characteristics.
- 7.53. Draft Local Plan Policy PLAN1 Part B requires proposals to comply with four key design principles of contextual, connected, inclusive and sustainable design. The development accords with these principles as demonstrated within the Design and Access Statement. Part C of the Draft Policy seeks a comprehensive site appraisal to inform the design, and compliance with a series of criteria. The comprehensive site appraisal is included in the Design and Access Statement, and the application is accompanied by a suite of drawings and technical assessments which demonstrate compliance against the criteria set out in Part C.
- 7.54. The Design and Access Statement sets out the design strategy and key design drivers that have shaped the design of the development. The proposed layout, height, scale and massing has evolved through a comprehensive process of review and consultation with LBI Officers, LBI Design Review Panel and through public consultation with the local community and key stakeholders. One of the key design principles of the development is to ensure an appropriate transition in scale between the development and surrounding context to protect neighbouring amenity, with building height sited to aid legibility and wayfinding.
- 7.55. Ultimately, and as demonstrated by the Design and Access Statement, the development is well designed, with high quality architecture complemented by extensive landscaping and areas of public



open space, which improves the local character. The development therefore achieves the objectives of the NPPF, National Design Guide, London Plan Policy GG1, Development Management Policies DPD Policy DM2.1, and Draft Local Plan Policy PLAN1.

### Building Height

7.56. The development is arranged across 5 plots ranging in height from 1 storey to 14 storeys across the Site. The development includes buildings above 30m in height.

7.57. London Plan Policy D9 Part A states that based on a local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. Part B states:

1. Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.
2. Any such locations and appropriate tall building heights should be identified on maps in Development Plans.
3. Tall buildings should only be developed in locations that are identified as suitable in Development Plans.

7.58. Supporting text to the Policy at Paragraph 3.9.2 states that:

Boroughs should determine and identify locations where tall buildings may be an appropriate form of development by undertaking the steps below:

1. based on the areas identified for growth as part of Policy D1 London's form, character and capacity for growth, undertake a sieving exercise by assessing potential visual and cumulative impacts to consider whether there are locations where tall buildings could have a role in contributing to the emerging character and vision for a place
2. in these locations, determine the maximum height that could be acceptable
3. identify these locations and heights on maps in Development Plans.

7.59. London Plan Policy D9 Part C sets out a series of impacts to be addressed by development proposals. The development performs well against the criteria as set out in **Table 6** below.

London Plan Policy D9 Part C Compliance	
Criteria	Response
<b>1) visual impacts</b>	
<p>a) the views of buildings from different distances:</p> <p>i) long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views</p> <p>ii) mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions, and materiality</p> <p>iii) immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character, and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.</p>	<p>The application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment within the Environmental Statement. This assesses the effect of the proposed development on the townscape and visual receptors of the Site and its surroundings, including long-range, mid-range and intermediate range views. The location and position of these views was agreed with LBI Officers as part of pre-application discussions. When assessing the impact of the proposed development, the Townscape, Visual and Above Ground Built Heritage Assessment concludes the development would have significant localised beneficial townscape effects on its surrounding context and some significant effects further from the Site where streets and spaces align with the development, which would be beneficial or neutral in nature. Any potential adverse townscape effects of the completed and operational Development have been mitigated or minimised during the iterative design development process prior to submission and all significant effects of the completed and operational Development would be beneficial or neutral in nature.</p> <p>The development would have significant localised beneficial effects on visual amenity within its close surrounding context and some significant effects further from the Site where streets and spaces align with the development. There would be an adverse nature of effect on</p>

	View 7 from the north-east end of Camden Road resulting from of a loss in dominance of the spire of the former Camden Road New Church in views from this part of Camden Road. All other visual effects would be beneficial or neutral in nature. Potential adverse visual effects of the completed and operational Development have been mitigated or reduced during the iterative design development process prior to submission and all significant effects of the completed and operational development.
b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding	The proposed massing has evolved through consultation with LBI Officers and Design Review Panel. The key design principles of the development include ensuring there is an appropriate transition in scale between the development and surrounding context to protect neighbouring amenity, with building height sited to aid legibility and wayfinding. The tallest plot, Plot C, is design as a landmark to identify the Women's Building and Public Garden (public park).
c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan	The development has been designed to be of a high architectural quality and includes the use of high quality materials. The Design and Access Statement provides further detail of proposed materials. The submission of specifications and samples of materials can be secured by way of planning condition.
d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that	The Site does not fall within a designated conservation area and is not occupied by any statutory listed or locally listed buildings. Tufnell Park Conservation Area is located to

<p>alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area</p>	<p>the northwest of the Site and Hillmarton Conservation Area is located to the south.</p> <p>The Townscape, Visual and Above Ground Built Heritage Assessment assesses the effect of the proposed development on surrounding heritage assets and concludes there would be effects on the ability to appreciate the heritage significance of the Hillmarton Conservation Area and the former Camden Road New Church as a result of the Development considered in isolation. The effect on the Hillmarton Conservation Area would be minor in scale and neutral in nature due to the balance of potentially adverse and potentially beneficial effects. The effect on the non-designated heritage asset, the former Camden Road New Church, which is a designated LBI landmark, would be minor in scale and adverse in nature due to a loss in dominance of the landmark spire in views from the north-east part of Camden Road; as the church is a non-designated heritage asset “a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset” (Ref 1-8, para.203). While there would be noticeable visual changes to the settings of some other heritage assets within the study area, no effects are assessed to the heritage significance or appreciation of heritage significance of any of the other heritage assets in the study area.</p>
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e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it	The Site is not located in the setting of a World Heritage Site and therefore this part is not applicable.
f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river	The Site is not located near the River Thames and therefore this part is not applicable.
g) buildings should not cause adverse reflected glare	The development will not result in adverse glare and the window and glazing specification will minimise any adverse effects of reflected glare. A Solar Glare Assessment was scoped out of the Environmental Statement.
h) buildings should be designed to minimise light pollution from internal and external lighting	The development will provide appropriate lighting to ensure the public realm is safe and legible whilst minimising light pollution. A full lighting assessment can be secured by way of planning condition.
<b>2) functional impacts</b>	
a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants	The development has been designed in accordance with Building Regulations Part Q, and further details are included in the Design and Access Statement. A Fire Statement accompanies the planning submission detailing the fire safety measures proposed.
b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process	The proposed servicing strategy is based on preserving the safety and quality of the public realm and minimising noise and disturbance. Further detail is included within the Waste Management Plan which accompanies the planning application.

	Further details regarding maintenance and management of buildings is included in the Design and Access Statement.
c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas	Entrances, access routes and ground floor uses have been carefully sited to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas. Further detail on the entrances, access and ground floor uses to each Plot is set out in the Design and Access Statement.
d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building	The Site is highly accessible by walking, cycling and public transport routes. The planning application is accompanied by a Transport Assessment which confirms that the capacity of the area and its transport network is capable of accommodating the quantum of development.
e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area	The development provides 1,822sqm of flexible commercial floorspace (Use Class E) located to the lower and upper ground floors of Plot B fronting Parkhurst Road, and the ground floor of Plot C fronting the Public Garden. When considered alongside the Women’s Building, Plot D residents facilities and Plot E Extra Care, the development is anticipated to deliver between 46 and 269 full time equivalent (FTE) permanent jobs, subject to the end users/occupiers of the commercial units and the Women’s Building.
f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings	It is not anticipated that the development, including its construction, would interfere with aviation, navigation or telecommunication. The Daylight, Sunlight and Overshadowing Assessment which accompanies the application considers the impact of the

	<p>development on PV panels to neighbouring properties. In light of this Assessment, it is considered that the level of impact is acceptable.</p>
<p><b>3) Environmental impact</b></p>	
<p>a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building</p>	<p>The application is accompanied by a Daylight, Sunlight and Overshadowing Assessment, and a Wind and Microclimate Assessment as part of the Environmental Statement. Wind mitigation measures incorporated within the proposed design to ensure the achievement of a suitable wind microclimate both in and surrounding the Site.</p>
<p>b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions</p>	<p>The application is accompanied by Wind and Microclimate Assessment which demonstrates that there will be no significant adverse effect on street level conditions.</p>
<p>c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building</p>	<p>The heights of the proposed buildings and the location of proposed plant will ensure that there will be no harm to the enjoyment of open spaces around the buildings. A Noise Impact Assessment assessing the proposed residential units within the development concludes that internal ambient noise level requirements as set out in LBI's Draft Local Plan can be achieved with relevant measures in place.</p> <p>A Noise Impact Assessment assessing the impact of the development on neighbouring sensitive receptors is included in the Environmental Statement, and confirms the completed and operational development would not give rise to any significant noise effects to sensitive receptors surrounding the</p>

	Site from the operation of building services and plant.
<b>4) cumulative impacts</b>	
a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.	The Scope of the Environmental Statement was agreed with the Council prior to submission and each Chapter includes cumulative scenarios to model the impacts of proposed and consented tall buildings. No substantial mitigation measures are required.

**Table 6: London Plan Policy D9 Part C Compliance**

7.60. London Plan Policy D9 Part D states free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London. Given the residential-led nature of the development, which has sought to maximise the number of affordable units, the provision of public areas within buildings which would have resulted in a reduction in the quantum of housing and affordable housing was not considered to represent best use of the Site. Roof areas have been fully utilised to provide Air Source Heat Plan, photovoltaic panels, green and brown roofs, and amenity spaces for residents. In addition, the most prominent tall building within the development is located to Plot C and contains the Women’s Building at lower and upper ground floors. Given the nature of this facility, it was not considered appropriate to locate publicly accessible areas to upper floors. Nevertheless, the development does provide free to enter publicly-accessible areas in the form of 10,480sqm of public open space which is considered to be more appropriate than providing internal areas within buildings given the open space deficit within the Borough.

7.61. In terms of adopted local policy, Core Strategy Policy CS9 Part E states:

New buildings and developments need to be based on a human scale and efficiently use the site area, which could mean some high density developments. High densities can be achieved through high quality design without the need for tall buildings. Tall buildings (above 30m high) are generally inappropriate to Islington's predominantly medium to low level character, therefore proposals for new tall buildings will not be supported. Parts of the Bunhill and Clerkenwell key area may contain some sites that could be suitable for tall buildings, this will be explored in more detail as part of the Bunhill and Clerkenwell Area Action Plan. (our emphasis)



7.62. Development Management Policies DPD Policy DM2.1 Part C states:

The only locations in Islington where tall buildings may be suitable are set out in the Finsbury Local Plan (Area Action Plan for Bunhill and Clerkenwell). Any proposal for tall buildings must meet other design policies and have regard for the criteria set out in English Heritage/CABE's Guidance on tall buildings (2007).

7.63. The Holloway Prison Site SPD does not specify minimum or maximum required building heights or set a restriction on height. The SPD sets out that consideration will need to be given to local views, local landmarks and heritage assets.

7.64. It is clear that the policy position is currently in transition and having regard to the impact tests set out in London Plan Policy D9, we consider buildings in excess of 30m on the Site appropriate. In any event, there are a number of townscape, public realm, and social infrastructure benefits in addition to the significant provision of housing and affordable housing.

7.65. With respect to the emerging local Development Plan, Draft Local Plan Policy DH1 and DH3 refer to building height. The Draft Local Plan is not yet afforded substantial weight given the Inspectors Report following EiP has not yet been issued.

7.66. Draft Local Plan Policy DH1 Part F states:

Tall buildings can help make best use of land by optimising the amount of development on a site, but they can also have significant adverse impacts due to their scale, massing and various associated impacts. Tall building locations must be carefully managed and restricted to specific sites where their impacts can be managed through appropriate design.

7.67. Draft Local Plan Policy DH3 states:

Part A: buildings of more than 30 metres, or those that are more than twice the contextual reference height of surrounding context (whichever is the lesser) will be considered to be tall buildings.

Part B: Buildings of more than 30 metres are only acceptable in-principle:

(i) on sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or

(ii) within specific sites identified in a Spatial Strategy area.

Part C: Each relevant allocation and/or Spatial Strategy area policy identifies the maximum permissible heights (in metres) suitable on the respective sites/locations. Any buildings proposed on these sites which exceed the identified maximum heights will be refused. Proposals for buildings of more than 30 metres are only acceptable where they fully satisfy the criteria identified in Part F.

- 7.68. Draft Local Plan Policy DH3 Part F states that tall buildings must be high quality in accordance with policy PLAN1. Designs for tall buildings must consider the individual and cumulative visual, functional, and environmental impacts, avoid negative impacts through good design, and mitigate any remaining negative impacts as far as possible. Part F sets out criteria that must be fully satisfied.
- 7.69. The development is considered against the criteria in the **Table 7** below and performs well.

Draft Local Plan Policy DH3 Compliance	
Visual Impact	
i) Protect the legibility and identity of the area by creating a positive landmark within the townscape and creating a strong sense of place;	The proposed massing has evolved through consultation with LBI Officers and Design Review Panel. The key design principles of the development include ensuring there is an appropriate transition in scale between the development and surrounding context to protect neighbouring amenity, with building height sited to aid legibility and wayfinding. The tallest plot, Plot C, is design as a landmark to identify the Women’s Building and Public Garden (public park).
ii) Protect and enhance strategic and local views, and views to local landmarks;	The application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment within the Environmental Statement. This assesses the effect of the proposed development on the townscape and visual receptors of the Site and its surroundings, including long-range, mid-range and intermediate range views. The location and position of these views was agreed with LBI Officers as part of pre-application discussions. When assessing the impact of the

	<p>proposed development, the Townscape, Visual and Above Ground Built Heritage Assessment concludes the development would have significant localised beneficial townscape effects on its surrounding context and some significant effects further from the Site where streets and spaces align with the development, which would be beneficial or neutral in nature. Any potential adverse townscape effects of the completed and operational Development have been mitigated or minimised during the iterative design development process prior to submission and all significant effects of the completed and operational Development would be beneficial or neutral in nature.</p> <p>The development would have significant localised beneficial effects on visual amenity within its close surrounding context and some significant effects further from the Site where streets and spaces align with the development. There would be an adverse nature of effect on View 7 from the north-east end of Camden Road resulting from of a loss in dominance of the spire of the former Camden Road New Church in views from this part of Camden Road. All other visual effects would be beneficial or neutral in nature. Potential adverse visual effects of the completed and operational Development have been mitigated or reduced during the iterative design development process prior to submission and all significant effects of the completed and operational development.</p>
<p>iii) Conserve and seek to enhance the significance of designated and nondesignated heritage assets and their</p>	<p>The Site does not fall within a designated conservation area and is not occupied by any statutory listed or locally listed buildings.</p>

<p>settings, relative to their respective significance;</p>	<p>Tufnell Park Conservation Area is located to the northwest of the Site and Hillmarton Conservation Area is located to the south.</p> <p>The Townscape, Visual and Above Ground Built Heritage Assessment assesses the effect of the proposed development on surrounding heritage assets and concludes there would be effects on the ability to appreciate the heritage significance of the Hillmarton Conservation Area and the former Camden Road New Church as a result of the Development considered in isolation. The effect on the Hillmarton Conservation Area would be minor in scale and neutral in nature due to the balance of potentially adverse and potentially beneficial effects. The effect on the non-designated heritage asset, the former Camden Road New Church, which is a designated LBI landmark, would be minor in scale and adverse in nature due to a loss in dominance of the landmark spire in views from the north-east part of Camden Road; as the church is a non-designated heritage asset “a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset” (Ref 1-8, para.203). While there would be noticeable visual changes to the settings of some other heritage assets within the study area, no effects are assessed to the heritage significance or appreciation of heritage significance of any of the other heritage assets in the study area.</p>
<p>iv) Be proportionate and compatible to their surroundings and the character of the area;</p>	<p>The development is compatible to its surroundings and character of the area, and</p>

	positively responds to the local context and character as detailed within the Design and Access Statement.
v) Promote exceptional design, through high quality design details and material, positively contribute to the skyline and to the immediate locality, and having regard to any site-specific design principles set out in the relevant site allocations and/or Spatial Strategy area policy, and other relevant design policies	The development has been designed to be of a high architectural quality and includes the use of high quality materials to positively contribute to the skyline and to the immediate locality. The Design and Access Statement provides further detail of design and proposed materials. The submission of specifications and samples of materials can be secured by way of planning condition. All relevant design standards have been considered and are addressed in this Statement.
vi) Provide an appropriate transition from the taller section of a building to the lower volume relating to the streetscape and surrounding context and ensuring a human scale street level experience;	The proposed massing has evolved through consultation with LBI Officers and Design Review Panel. The development provides an appropriate transition from the taller section of buildings to the lower volumes relating to the streetscape and surrounding context and ensuring a human scale street level experience. This is demonstrated in the Design and Access Statement.
<b>Functional Impact</b>	
vii) Not prejudice the ongoing functionality, amenity or operation of sites in the local area; and/or the development potential of sites in the local area, taking into account the individual impact of the proposal and cumulative impacts of existing and permitted development in the area (all development not just tall buildings);	The development will not prejudice the ongoing functionality, amenity or operation of sites in the local area, taking into account the individual impact of the proposal and cumulative impacts of existing and permitted development in the area, as demonstrated within the Environmental Statement.
viii) Ensure that impacts on the levels of daylight and sunlight – both into and between proposed buildings and for	The application is accompanied by a Daylight, Sunlight and Overshadowing Assessment to ensure the impact on the levels of daylight and

<p>adjoining land or properties - are fully assessed and found to be acceptable; and that unacceptable overshadowing is prevented;</p>	<p>sunlight both into and between proposed buildings and for adjoining land or properties are fully assessed. In light of this Assessment, it is considered that the level of impact is acceptable.</p>
<p>ix) Demonstrate how the building will operate and function to provide good levels of amenity for all building users, through provision of a detailed building management plan which details how the proposed building will operate in various circumstances, including emergency procedures. Plans must include information on peak time ingress and egress and the interaction with local and strategic infrastructure; delivery and servicing; vertical transportation; waste arrangements; emergency escape routes and other relevant building services;</p>	<p>The development will operate and function to provide good levels of amenity for all building users and further detail is provided in the accompanying application documents concerning delivery and servicing, transportation, waste, emergency escape and other relevant building services. This includes detail on peak time activities. The development will be managed by Peabody and their relevant estate management team or organisation.</p>
<p><b>Environmental Impact</b></p>	
<p>x) Promote exceptional sustainable design standards;</p>	<p>The development has been designed to promote exceptional sustainable design standards as set out in the Sustainable Construction and Design Statement.</p>
<p>xi) Demonstrate that development does not adversely impact, either individually or cumulatively, on the microclimate of the surrounding area, including the proposal site and any public space in close proximity to the site. This may require submission of detailed assessments and/or modelling work; and</p>	<p>The application is accompanied by Wind and Microclimate Assessment which forms part of the Environmental Statement which demonstrate that there will be no adverse impact either individually or cumulatively, on the microclimate of the surrounding area. Wind mitigation measures incorporated within the proposed design to ensure the achievement of a suitable wind microclimate both in and surrounding the Site.</p>

<p>xii) Demonstrate that development does not have any adverse individual or cumulative impacts on biodiversity, including watercourses and water bodies and their hydrology</p>	<p>The application is accompanied by a suite of technical documents to demonstrate that the development does not have any adverse impacts on biodiversity, including watercourses and water bodies and their hydrology.</p>
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**Table 7: Draft Local Plan Policy DH3 Compliance**

**Affordable Housing**

- 7.70. London Plan Policy H4 sets a strategic target for 50% of all new homes that are delivered across London to be genuinely affordable. For public sector land the requirement is 50% to be delivered on each site.
  
- 7.71. London Plan Policy H5 states the following criteria must be met in order for a development to follow the Fast Track Route:
  - meet or exceed the relevant threshold level of affordable housing on site without public subsidy
  - be consistent with the relevant tenure split (see Policy H6 Affordable housing tenure)
  - meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant
  - demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing
  
- 7.72. Supporting text to the Policy at Paragraph 3.9.2 states that where there is an agreement with the Mayor to deliver at least 50% across the portfolio of sites, then the 35% threshold should apply to individual sites. Peabody has entered into a Strategic Partnership Agreement with the GLA and therefore the 35% threshold applies to the Site.
  
- 7.73. London Plan Policy H6 specifies a tenure split of 30% low cost rent (incl. social rent), 30% intermediate (incl. London Shared Ownership), and 40% to be determined by the borough as low-cost rented homes or intermediate products.

- 7.74. Core Strategy Policy CS12 Part G requires 50% of additional housing to be built in the borough over the plan period to be affordable. The Policy requires a tenure split of 70% social housing and 30% intermediate housing.
- 7.75. Draft Local Plan Policy H3 Part D requires sites which are currently or have been in public sector ownership to provide 50% affordable housing without public subsidy and exhaust all potential options for maximising the delivery of on-site affordable housing in excess of 50%, particularly through securing relevant public subsidy. Draft Local Plan Policy H3 Part H requires an affordable housing tenure split of 70% social rented housing and 30% intermediate housing. The majority of intermediate units should (our emphasis) be London Living Rent, and regard will be given to the priorities set out in the Council’s Housing Strategy and other agreed evidence of housing need.
- 7.76. The Site is public sector land given its previous use as a prison operated on behalf of the Ministry of Justice.
- 7.77. The development provides 60% affordable housing (by unit) with a tenure split of 70% social rent, with rent levels set at Target Rent, and 30% London Shared Ownership, as follows:

Affordable Provision		
	Units	Percentage (%)
<b>Affordable, comprising:</b>	593	60%
<i>Social rent</i>	415 (70%)	
<i>London Shared Ownership</i>	178 (30%)	
<b>Market</b>	392	40%
<b>Total</b>	985	100%

**Table 8: Affordable Housing Provision**

- 7.78. The development provides 60% affordable housing (by unit) on-site. The first 50% is provided without grant. The Applicant has sought to maximise affordable housing beyond the minimum required amount of 50% and provides the additional 10% affordable housing utilising grant. This results in a total offer of 60% affordable housing.
- 7.79. When measured by habitable room the development provides 62% affordable housing with a tenure split of 75% social rent, with rent levels set at Target Rent, and 25% London Shared Ownership, as follows:

Affordable Provision by Habitable Room		
	Habitable Room	Percentage (%)



<b>Affordable, comprising:</b>	1784	62%
<i>Social rent</i>	1346 (75%)	
<i>London Shared Ownership</i>	438 (25%)	
<b>Market</b>	1116	38%
<b>Total</b>	2900	100%

**Table 9: Affordable Housing Provision By Habitable Room**

7.80. The affordable housing provision is compliant with London Plan Policy H4, H5 and H6, Core Strategy Policy CS12 and Draft Local Plan Policy H3. The development is eligible for the Fast Track Route. Nevertheless, LBI has requested the Applicant submit a Viability Assessment. In accordance with this request a Viability Assessment is submitted and the Applicant is happy for this to be made publicly available alongside the other application documents.

**Housing Mix**

7.81. London Plan Policy H10 sets out that developments should generally consist of a range of sizes having regard to a number of characteristics. The London Plan does not set a prescriptive mix that developments are required to follow.

7.82. Core Strategy Policy CS12 requires a range of unit sizes within each housing proposal, whilst maximising the proportion of family accommodation in both affordable and market housing.

7.83. Development Management Policies DPD Policy DM3.1 states that all sites should provide a good mix of housing sizes, noting the housing mix required on all residential developments will be based on Islington's Local Housing Needs Assessment, and the requirements of any updated housing needs surveys and/or assessments prepared by or on behalf of the Council. The supporting text to this Policy included a table setting out the housing mix required for each housing tenure, as follows:

Tenure	1-bed	2-bed	3-bed	4-bed or more	Total
Market	10%	75%	15%	0%	100%
Intermediate	65%	35%	0%	0%	100%
Social Rented	0%	20%	30%	50%	100%

**Figure 4: Extract of Development Management Policies DPD Table 3.1**

7.84. The Holloway Prison Site SPD does not set a prescriptive mix, with Paragraph 4.12 stating:

*‘Developments are required to provide a mix of units across different tenures. The exact mix of units should be confirmed in discussions with the council at planning stage. However, the size of the site*

*would lend itself well to the provision of a genuine mix of unit sizes, including a significant proportion of family accommodation of 3 bedrooms or more.'*

- 7.85. The emerging site allocation in the Draft Site Allocations (2019, as modified 2021) does not set a prescriptive mix.
- 7.86. Draft Local Plan Policy H2 states all development proposals must provide a good mix of unit sizes which contributes to meeting the housing size mix priorities set out in Table 3.2. The housing mix priorities are set out as 'none', 'low', 'medium' and 'high'. Draft Local Plan Policy H2 does not define 'low', 'medium' and 'high'.

Tenure	Studio/bedsit	1-bed	2-bed	3-bed	4-bed
Social rented	None	Low/Medium	High	Medium	Low
Intermediate rent – at London Living Rent levels (or rents akin to social rent)	None	Medium	High	Medium	Low
Intermediate rent – other Discounted Market Rent products	None	High	Medium	None	None
Intermediate – shared ownership	None	High	Medium	None	None
Market	None	Low	High	Medium	Low

**Figure 5: Extract of Draft Local Plan Table 3.2**

- 7.87. Given the Draft Local Plan is supported by a suite of evidence base documents which include assessments on housing need, in accordance with Development Management Policies DPD this is considered to be of greater relevancy than the mix set out in Table 3.1 above. Therefore development has sought to provide a mix that responds to Draft Local Plan Table 3.2, which is based on the latest housing need evidence. The development also responds to advice from the LBI's Housing Team regarding the social rent mix that the greatest need is for 2 and 3 bedroom social rent accommodation.
- 7.88. The housing mix of the development is summarised in Table 10 below:

Unit Mix						
	1 bed	1 bed	2 bed	3 bed	4 bed	Total

	<b>Extra Care</b>					
	<b>Unit (%)</b>	<b>Unit (%)</b>	<b>Unit (%)</b>	<b>Unit (%)</b>	<b>Unit (%)</b>	<b>Unit (%)</b>
<b>Social Rent Extra Care</b>	60 (100%)	/	/	/	/	60 (100%)
<b>Social Rent</b>	/	46 (13%)	209 (59%)	87 (24%)	13 (4%)	355 (100%)
<b>London Shared Ownership</b>	/	96 (54%)	82 (46%)	/	/	178 (100%)
<b>Market</b>	/	87 (22%)	278 (71%)	27 (7%)	/	392 (100%)
<b>Total</b>	60	229	569	114	13	985

**Table 10: Unit mix**

- 7.89. The social rent provision of 415 units includes 60 Extra Care social rent 1-bedroom homes which meet a specific need, in accordance with Draft Local Plan Policy H7.
- 7.90. The development provides a mix of 1 to 4 bedroom units, including 696 family homes (2+ bedroom as defined in supporting text to Draft Local Plan H2).
- 7.91. The development is considered to provide an appropriate mix of units taking into account housing need, the characteristics of the development and the proposed tenures, in accordance accord with London Plan Policy H10, Core Strategy Policy CS12, Development Management Policies DPD Policy DM3.1, and Draft Local Plan H2.

### **Quality and Design of Residential Units**

- 7.92. London Plan Policy D6 and the Mayor's Housing SPG sets out housing standards for residential development.
- 7.93. Development Management Policies DPD Policy DM3.4 sets out further housing standards that developments are required to meet. This includes standards, such as a requirement for a 2.6m floor to ceiling height, which differ from the standards in the London Plan and Mayor's Housing SPG.
- 7.94. Draft Local Plan Policy H4 sets out housing standards.
- 7.95. The residential accommodation proposed has been designed to accord with the relevant standards. Compliance is demonstrated within the Design and Access Statement and within the policy matrices appended to this Statement. As a summary, the following key design standards are met:

- All units meet or exceed the required minimum space standards and storage space standards.
- All units have a floor to ceiling height of 2.6m in accordance with LBI's adopted and draft standard (noting this is a higher requirement than the London Plan and Mayor's Housing SPG).
- All units are served by private amenity space which accords with the size standard in LBI's adopted and draft standard (noting this is a higher requirement than the London Plan and Mayor's Housing SPG).
- Dual aspect accommodation has been maximised and 94% of units are dual aspect.
- 12% of units are wheelchair homes (120 units) designed in accordance with Building Regulations Part M4(3), which exceeds the policy requirement. The remainder are designed in accordance with Building Regulations Part M4(2).
- All units are served by necessary ancillary facilities such as cycle stores, refuse and recycling stores, entrance lobbies and lift/stair cores.

7.96. On this basis, it is considered that the development complies with London Plan Policy D6, Development Management Policies DPD Policy DM3.4 and Draft Local Plan Policy H4.

### **Quality and Design of Women's Building**

7.97. London Plan Policy S1 sets out that proposals providing high quality, inclusive social infrastructure will be supported.

7.98. Development Management Policies DPD Policy DM4.2 requires new social infrastructure to be located in areas convenient for the communities they serve and accessible by a range of sustainable transport modes, including walking, cycling and public transport; provide buildings that are inclusive, accessible, flexible and which provide design and space standards which meet the needs of intended occupants; be sited to maximise shared use of the facility, particularly for recreational and community uses; and complement existing uses and the character of the area, and avoid adverse impacts on the amenity of surrounding uses.

7.99. The Holloway Prison Site SPD also sets out a number of aspirations for the Women's Building including that this is a safe, women only space, with separate and secure access and outdoor amenity, that it is provided as part of a high quality flexible facility that can allow multiple services to operate from the building, and that it provides a safe and pleasant place for clients accessing the services.

- 7.100. Draft Local Plan Policy SC1 requires new social and community infrastructure to meet a series of criteria. The development is considered against the criteria in the **Table 11** below.
- 7.101. The development provides a 1,489sqm Women's Building (Use Class F.2) split across the lower and upper ground floors of Plot C, fronting Parkhurst Road. This exceeds the range set out in the draft Women's Building Development Brief (June 2020).
- 7.102. The Women's Building provides an active frontage on Parkhurst Road and Plot C has been designed to provide a celebratory, open and inviting frontage. Internally, the Women's Building has been designed flexibly to enable the space to meet the needs of future operators. Indicative internal layouts are shown in the Design and Access Statement, which accompanies this application submission. The Women's Building is served by a dedicated and secure garden.

Draft Local Plan Policy SC1 (H) criteria	Assessment
(i) be located in areas convenient for the communities they serve and accessible by a range of sustainable transport modes, including walking, cycling and public transport;	The Women's Building is located in an area convenient for the community it will service and is accessible by a range of sustainable transport modes, including walking, cycling and public transport.
(ii) provide buildings that are inclusive, accessible, flexible, sustainable and which provide design and space standards which meet the needs of intended occupants;	The Women's Building is inclusive, accessible, flexible, sustainable and provides design and space standards which meet the needs of intended occupants.
(iii) provide appropriate drop-off/pick-up facilities for disabled people;	Given the highly accessible nature of the Site to public transport, the development is 'car free', with the exception of accessible spaces to serve the residential element of the development. A series of loading bays are provided across the development which could be utilised for drop-off/pick-up facilities for disabled people should the Council consider this necessary.
(iv) be sited to maximise shared use of the facility, particularly for sports, recreational and community uses;	The Women's Building has been sited to maximise use of the facility. The final operator/s of the Women's Building has not yet been determined but it may be shared by multiple women's services providers. Given the nature of the facility there is limited scope for sport and

	recreation, however opportunities for these activities is provided in the publicly accessible Public Garden.
(v) complement existing uses and the character of the area, and avoid adverse impacts on the amenity of surrounding uses.	The Women’s Building complements existing uses and the character of the area, and avoids adverse impacts on the amenity of surrounding uses.

**Table 11: Assessment against Draft Local Plan Policy SC1 (H)**

7.103. On this basis, it is considered that the proposed Women’s Building fully accords with London Plan Policy S1, Development Management Policies DPD Policy DM4.2, Draft Local Plan Policy SC1 and the Holloway Prison Site SPD.

**Quality and Design of Commercial Units**

7.104. London Plan Policies E1 and E9 includes support for high quality commercial development, including office and retail space.

7.105. Draft Local Plan Policy R1 states that new retail development must incorporate the highest inclusive design standards achievable in context, in line with relevant guidance produced by the Council.

7.106. The development provides 1,822sqm of flexible commercial floorspace (Use Class E) located to the lower and upper ground floors of Plot B fronting Parkhurst Road, and the ground floor of Plot C fronting the Public Garden. The commercial floorspace is split across a range of unit sizes, and all have generous floor to ceiling heights.

7.107. The Plot B commercial floorspace provides an active frontage to Parkhurst Road, complementing the active frontage provided by the Women’s Building, located to Plot C.

7.108. The commercial unit to Plot C fronts the Public Garden and provides activation to the public open space, complementing the active frontage provided by the residents’ facilities located to the ground floor of Plot D.

7.109. On this basis it is considered that the proposed flexible commercial floorspace fully accords with London Plan Policy E1 and E9 and Draft Local Plan Policy R1.

## Public Realm and Landscaping

- 7.110. London Plan Policy D8 sets out that development proposals should explore opportunities to create new public realm where appropriate, whilst ensuring this is well-designed, safe, inclusive and well-connected. Further to this, landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.
- 7.111. Development Management Policies DPD Policy DM8.4 states that where public realm works are required as part of development, these shall be undertaken to best practice standards.
- 7.112. Draft Local Plan Policy T4 states that development proposals must respond positively to public realm and ensure that this is safe and convenient for all users, increases natural surveillance, contributes to the quality and quantity of green infrastructure and promotes use from a diverse range of users.
- 7.113. Landscaping has been central to the proposed design and the development incorporates a series of publicly accessible open spaces including the Public Garden, Nature Garden, and Trecastle Connection.
- 7.114. A full assessment against the relevant landscaping and public realm policies is included within the matrices appended to this Statement. This demonstrates that the development fully complies with London Plan Policy D8, Development Management Policies DPD Policy DM8.4 and Draft Local Plan Policy T4.

## Public Open Space

- 7.115. Development Management Policies DPD Policy DM6.2 states developments in excess of 200 residential units are required to provide on-site publicly accessible public open space. This shall be provided in addition to private amenity space and landscaping and shall be fully publicly accessible, without any restrictions and maintained in perpetuity. Supporting text at Paragraph 6.20 states public open space should be provided in new development based on 5.21 sqm per resident and 2.6 sqm per employee.
- 7.116. These requirements are carried forward into Draft Local Plan Policy G3. Supporting text to this Draft Policy states evidence suggests that a standard of open space of 5.21sqm per resident and 2.6sqm per employee should be provided. This standard must be used to inform the level of public open space provision.
- 7.117. The development provides 10,480sqm of public open space, formed of the Public Garden (public park), nature garden and Trecastle connection. In accordance with Development Management Policies DPD Policy DM6.2 and Draft Local Plan Policy G3, the public open space is provided in addition

to private amenity space and landscaping and shall be fully publicly accessible, without any restrictions and maintained in perpetuity. The public open space provision has been considered in the context of the suggested standard of 5.21sqm per resident and 2.6sqm per employee set out in the supporting text to the adopted and draft policies, as set out in **Table 12** below. Based on the suggested standard, between 11,616.507 sqm to 12,196.307 sqm of public open space would be sought. This is expressed as a range given the employment generation could vary within the flexible Class E commercial space and within the Women's Building and reflects the minimum and maximum estimated job creation for the scheme. The development provides 10,480sqm of public open space, which equates to between 85.9% and 90.2% of the suggested standard taking into account the quantum of residents and the minimum and maximum estimated job creation.

Quantum of residents and employees	Suggested Standard	Total	Provision within the Development
2206.7 residents	5.21sqm per resident	11,496.907 sqm	/
Between 46 and 269 gross full time equivalent (FTE) permanent jobs	2.6sqm per employee	119.6 sqm to 699.4 sqm.	/
Total	/	11,616.507 sqm to 12,196.307 sqm	10,480 sqm (85.9% to 90.2%)

**Table 12: Public Open Space provision**

- 7.118. In addition, the development provides further open space which will be publicly accessible along the Camden/Parkhurst Road frontage. This area comprises 1,463 sqm and will include new street trees, cycle parking, ecological planting, spill-out spaces and seating. When considered alongside the above spaces, the development totals 11,943sqm, which equates to between 97.9% to 102.8% of the suggested standard.
- 7.119. The development is considered to provide an appropriate quantum of public open space, taking into account other policy requirements, the need to ensure best use of the land and the wider public benefits the development delivers including the significant provision of housing and affordable housing. The development is therefore considered to accord with Development Management Policies DPD Policy DM6.2 and Draft Local Plan Policy G3.

### **Amenity and Play Space**

- 7.120. As set out in Development Management Policies DPD Policy DM3.5, there is a minimum requirement of 5sqm of private outdoor space on upper floors and 15sqm on ground floors for 1-2 person



dwellings, with an extra 1sqm required on upper floors and an extra 5sqm on ground floors for each additional occupant. This standard has been carried forward in Draft Local Plan Policy H5.

- 7.121. All residential units will have access to private amenity space, either in the form of a private garden, balcony or terrace. All private amenity spaces have been designed to be of a high quality and the size is in accordance with Development Management Policies DPD Policy DM3.5 and Draft Local Plan Policy H5.
- 7.122. With respect to play space, London Plan Policy S4 requires at least 10sqm of play space to be provided per child. Development Management Policies DPD Policy DM3.6 requires provision for 5sqm of private/informal play space per child. This standard has been carried forward in Draft Local Plan Policy SC2.
- 7.123. Play is a fundamental part of the proposals and the landscaping strategy proposes a child-friendly public realm by integrating imaginative play as part of the overall design and ensuring there is a range of play options across the development. The proposals include 5,292 sqm of play space, which exceeds the requirement when calculated using the GLA Playspace Calculation based on 10 sqm per child (requirement of 5226.1sqm). All play space is proposed at ground, podium and first floor levels and there is no play space proposed at roof level.
- 7.124. The approach to the amenity and play space accords with London Plan Policies S4, Development Management Policies DPD Policies DM3.5 and DM3.6, and Draft Local Plan Policies H5 and SC2.

### **Highways and Transport**

- 7.125. An integral part of the development has been to create attractive and distinctive streets, maximising greenery and integrating ecology alongside the required parking and servicing provision. The development has been designed with the Healthy Streets approach set out in London Plan Policy T1 with priority given to pedestrians and cyclists which is incorporated into the landscape and public realm strategy.
- 7.126. The development seeks to upgrade the footway and public realm along the frontage of the development on Camden Road and Parkhurst Road and will provide improvements to the existing pedestrian crossing on Camden Road.
- 7.127. There is one internal road proposed within the development ('Residential Street') which has been designed in accordance with the Islington Streetbrook SPD (2012). Section 5.2 of the SPD concerns the Route:Place spectrum analysis which requires consideration of the scale, character, status of streets. The Design and Access Statement and Open Space and Recreation Assessment and Landscape Design

Strategy submitted as part of the planning application includes analysis of the proposed Residential Street with respect to scale, character and status in accordance with the requirement.

- 7.128. The development seeks to increase permeability within the Site and beyond, including through the provision of a new pedestrian and cycle connection to Trecastle Way, which will be provided where LBI provides necessary land access rights.

#### *Car Parking*

- 7.129. London Plan Policy T6 states car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport. London Plan Policy T6.1 states disabled persons parking should be provided for new residential developments, with one designated disabled persons parking bay per dwelling is available from the outset for 3% of dwellings. Developments should also demonstrate how additional spaces could be provided for a further 7% of dwellings.
- 7.130. Development Management Policies DPD Policy DM8.5 and Draft Local Plan Policy T3 also support car-free development.
- 7.131. The development is proposed as car-free with the provision of Blue Badge parking spaces only to serve the residential units. The development provides a total of 30 car parking spaces, which equates to one space per dwelling for 3% of dwellings, in accordance with London Plan Policy T6.1.
- 7.132. With respect to additional parking spaces, to provide up to 10% of residential units with a Blue Badge parking space, Peabody has agreed to a financial contribution of £2,000 per space not provided on-site. This accords with LBI's Planning Obligations (Section 106) SPD (2016).
- 7.133. Given the Site is highly accessible by non-car modes of travel, including on foot, by cycle and by public transport and has a PTAL score of 6a ('excellent'), as demonstrated in the Transport Assessment, the majority of trips generated by the Women's Building and commercial uses are expected to be undertaken by walking and public transport. On this basis, no disabled parking is provided for the non-residential elements of the proposed development.
- 7.134. Details of the car parking and how this is designed and will be managed in line with TfL guidance are included in the Parking Design and Management Plan. The development therefore complies with the relevant transport policies including London Plan Policy T6, Development Management Policies DPD Policy DM8.5 and Draft Local Plan Policy T3.

#### *Cycle Parking*

- 7.135. Cycle parking will be provided for all uses in line with the standards set out in London Plan Policy T5. The level of provision is shown in **Table 13** below:

Use	Long stay spaces	Short stay spaces
Residential (Use Class C3)	1,855 (80% two-tier stands, 15% standard Sheffield stands, 5% oversized Sheffield stands)	62
Residents' facilities including concierge (Use Class C3)	4	6
Commercial (Use Class E)	20	26
Women's Building (Use Class F.2)	18	18
<b>TOTAL</b>	1897	112

**Table 13: Proposed cycle parking**

- 7.136. Cycle stands for the residential units will be located in a secure store within each of the residential cores and has been designed in accordance with LCDS and includes provision for accessible cycle parking spaces. Separate cycle parking spaces are provided for the non-residential elements of the development.
- 7.137. The development also includes short-stay cycle parking in the form of Sheffield stands within the public realm that will be conveniently located for future uses.
- 7.138. The cycle parking for the development therefore fully accords with planning policy requirements in terms of quantum and design, as confirmed in the Policy Tables in Appendix II-VI.

#### *Delivery and Servicing*

- 7.139. London Plan Policy T7, Development Management Policies DPD Policy DM8.2 and Draft Local Plan Policy T5 require appropriate provision for servicing to be made.
- 7.140. Plot D will provide residents' facilities including concierge to serve the development. The majority of large deliveries for the residential units will be delivered to this area. This will allow delivery providers to consolidate the trips to the site and reduce the chance of missed deliveries, which then require the provider to return to the Site. The development will have areas adjacent to each residential lobby entrance sized to accommodate a cargo bike, to enable couriers to safely park their bikes and deliver to a concierge/locker, whilst maintaining sight of the bike. The area can be protected from improper parking by CCTV enforcement or bollards.

- 7.141. The planning application is accompanied by a Delivery and Servicing Plan and a Waste Management Plan which provide further details of the delivery and servicing arrangement for the development.
- 7.142. The development therefore accords with London Plan Policy T7, Development Management Policies DPD Policy DM8.2 and Draft Local Plan Policy T5.

### **Energy and Sustainability**

- 7.143. The Site lies within a Heat Network Priority Area. London Plan Policy SI3 and LBI Draft Local Plan Policy S5 set out a heating hierarchy and Step 1 requires major developments located within 500m of an existing or planned heat network to connect to that network. There are no existing or planned networks within 500m of the Site. Therefore, connection to an existing or future network is not possible and the scheme must proceed to Step 2. Step 2 of the heating hierarchy is to use zero-emission or local secondary heat sources (in conjunction with heat pump, if required). In accordance with this requirement, the development provides a communal low temperature site wide Air Source Heat Pump network in conjunction with an extensive PV array at roof level.
- 7.144. The proposed on-site energy network will be future proofed to enable connection to an off-site District Heating Network should one materialise in the future.
- 7.145. LBI Development Management Policies DPD Policy DM7.3 and Draft Local Plan Policy S5 sets out that where connection to an existing or future heat network is not possible, major developments should develop and/or connect to a low or zero carbon Shared Heating Network (SHN) linking neighbouring developments and/or existing buildings, unless it can be demonstrated that this is not reasonably possible. The Holloway Prison Site SPD states the heating network should explore opportunities to share heat with neighbouring buildings through providing additional capacity as well as potential connection to district networks in the wider area (including the Holloway Road and Highbury West clusters). LBI identified a series of neighbouring developments during the course of pre-application discussions. These developments were reviewed by the consultant team and it was determined that it is not reasonably possible to develop and/or connect to a Shared Heating Network (SHN) linking to any of these developments to the Site. Further detail regarding the review is set out in the Sustainable Design and Construction Statement which accompanies the application.
- 7.146. The application is accompanied by a Circular Economy Statement and Sustainable Design and Construction Statement, which includes an Overheating Assessment, Whole Life Carbon Cycle Assessment, Green Performance Plan, BREEAM Pre-Assessment, and Net Zero Carbon Feasibility Study.

- 7.147. The Sustainable Design and Construction Statement confirms the development secures a reduction of 52.1% in regulated carbon dioxide emissions beyond the baseline of Part L of Building Regulations (2013), which exceeds the minimum required 35% sought by the London Plan. The remaining quantum will be off-set via a financial payment to the Borough's carbon off-set fund at a rate of £95 per tonne over 30 years.
- 7.148. The development also follows the principles of the circular economy and whole-life cycle carbon, as detailed in the Circular Economy Statement and Sustainable Design and Construction Statement.
- 7.149. On this basis, the development accords with the principle of London Plan Policy SI2 and S13, Development Management Policies DPD Policy DM7.3 and Draft Local Plan Policy S1 to S5.

### **Ecology and Trees**

- 7.150. London Plan Policy G6 sets out that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 7.151. London Plan Policy G7 states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed.
- 7.152. Development Management Policies DPD Policy DM6.5 states developments are required to minimise any impacts on trees, shrubs and other significant vegetation. Any loss of or damage to trees, or adverse effects on their growing conditions, will only be permitted where there are over-riding planning benefits, must be agreed with the Council and suitably re-provided. This Policy also requires landscape design to maximise biodiversity benefits and ecological connectivity.
- 7.153. Draft Local Plan Policy G4 states any loss of trees planting will only be permitted where it is demonstrably unavoidable in order to meet other relevant Local Plan policy requirements (as agreed with the Council). In such circumstances, suitable high quality re-provision of equal value must be provided on-site. This Policy also requires landscape design to maximise biodiversity benefits and ecological connectivity.
- 7.154. There are existing trees on the Site, ranging from Category A to Category U. The development layout has been designed with the aim of retaining as many trees as possible with a total of 29 trees and 3 tree groups retained. This includes retention of the single Category A tree. The development will result in the removal of 44 individual trees, 10 groups of trees and 3 hedges, none of which of graded as

Category A. In order to mitigate this loss and to provide a high quality landscape, the development will deliver a substantial net gain in the number of trees and canopy cover for the Site, with 364 additional new trees to be delivered. Further detail is included within the Arboricultural Impact Assessment and Open Space and Recreation Assessment and Landscape Design Strategy which accompany this planning submission.

- 7.155. In addition, the development delivers a biodiversity net gain of 16.87% and secures an Urban Greening Factor score of 0.42 which exceeds the London Plan requirement.
- 7.156. The development therefore accords London Plan Policy G6 and G7, Development Management Policies DPD Policy DM6.5 and Draft Local Plan Policy G4.

### **Heritage and Townscape**

- 7.157. London Plan Policy HC1 requires development proposals affecting heritage assets, and their significance, to conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings.
- 7.158. Development Management Policies DPD Policy DM2.3 relates to heritage and sets out that the Council will ensure that the borough's heritage assets are conserved and enhanced in a manner appropriate to their significance. Policy DM2.4 identifies a series of local views which the Council will seek to protect and enhance.
- 7.159. These requirements are carried forward into Draft Local Plan Policy DH2.
- 7.160. The Site and surrounding area are characterised by built form which varies in typology, scale, footprint, height and land use. Buildings and structures within and surrounding the Site are generally low to medium rise with some taller buildings present in the wider area surrounding the Site.
- 7.161. Owing to the wholesale renovation of the Site between 1971 and 1985, there are no buildings of historic interest (statutorily designated or otherwise) within the Site.
- 7.162. The Site is not located within the Protected Vista of a designated London View Management Framework.
- 7.163. The Site does lie within the viewing corridor of two LBI protected views:
- Local View 4, Archway Road to St Paul's Cathedral
  - Local View 5, Archway Bridge to St Paul's Cathedral

- 7.164. The Site does not lie within a Conservation Area, however, is within 20m of Hillmarton Conservation Area (which lies to the south, south-west, east and north-east of the Site) and within 50m of Tufnell Park Conservation Area (which lies to the west and north-west of the Site). The Hillmarton Conservation Area is characterised by two and three storey Victorian semi-detached and terraced houses and the Tufnell Park Conservation Area is characterised by Edwardian and Victorian three storey housing.
- 7.165. With respect to above ground heritage assets, there are no World Heritage Sites, Scheduled Monuments or Registered Parks and Gardens within the Site, or within 1km for the Site.
- 7.166. There are no statutorily listed buildings or locally listed buildings within the Site. There are four listed buildings within 250m of the Site including the Grade II Listed St Luke's Church, Verger's Cottage, former Baptist Church and no. 23 Carleton Road. There are also a number of locally listed buildings in the vicinity of the Site.
- 7.167. The application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment within the Environmental Statement. This assesses the effect of the proposed development on the townscape and visual receptors of the Site and its surroundings, including long-range, mid-range and intermediate range views. The location and position of these views was agreed with LBI Officers as part of pre-application discussions. When assessing the impact of the proposed development, the Townscape, Visual and Above Ground Built Heritage Assessment concludes the development would have significant localised beneficial townscape effects on its surrounding context and some significant effects further from the Site where streets and spaces align with the development, which would be beneficial or neutral in nature. Any potential adverse townscape effects of the completed development have been mitigated or minimised during the iterative design development process prior to submission and all significant effects of the completed development would be beneficial or neutral in nature.
- 7.168. The development would have significant localised beneficial effects on visual amenity within its close surrounding context and some significant effects further from the Site where streets and spaces align with the development. There would be an adverse nature of effect on View 7 from the north-east end of Camden Road resulting from a loss in dominance of the spire of the former Camden Road New Church in views from this part of Camden Road. All other visual effects would be beneficial or neutral in nature. Potential adverse visual effects of the completed and operational Development have been mitigated or reduced during the iterative design development process prior to submission and all significant effects of the completed and operational Development.

- 7.169. With respect to surrounding heritage assets the Assessment concludes there would be effects on the ability to appreciate the heritage significance of the Hillmarton Conservation Area and the former Camden Road New Church as a result of the Development considered in isolation. The effect on the Hillmarton Conservation Area would be minor in scale and neutral in nature due to the balance of potentially adverse and potentially beneficial effects. The effect on the non-designated heritage asset, the former Camden Road New Church, which is a designated LBI landmark, would be minor in scale and adverse in nature due to a loss in dominance of the landmark spire in views from the north-east part of Camden Road; as the church is a non-designated heritage asset “a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset” (Ref 1-8, para.203). While there would be noticeable visual changes to the settings of some other heritage assets within the study area, no effects are assessed to the heritage significance or appreciation of heritage significance of any of the other heritage assets in the study area.
- 7.170. We consider the impact of the development to be acceptable with respect to townscape and heritage. In addition, there are a number of public realm and social infrastructure benefits in addition to the significant provision of housing and affordable housing.

### **Archaeology**

- 7.171. London Plan Policy HC1 requires development proposals to identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.
- 7.172. Development Management Policies DPD Policy DM2.3 sets out that Archaeological priority areas are identified on the Policies Map and in Appendix 7 of the DPD and all planning applications likely to affect important archaeological remains are required to include an Archaeological Assessment.
- 7.173. Draft Local Plan Policy DH2 of Islington requires proposals which have the potential to affect archaeological remains and/or heritage assets of archaeological interest to include an Archaeological Assessment.
- 7.174. The Site is not located within an Archaeology Priority Area. The planning application is accompanied by a Historic Environment Assessment to satisfy London Plan Policy HC1, Development Management Policies DPD Policy DM2.3 and Draft Local Plan Policy DH2. The Assessment considers the Site to be of limited archaeological potential, with any remains predicted to be of no more than medium significance.

### **Flooding and Drainage**



- 7.175. London Plan Policy SI12 requires development proposals to ensure that flood risk is minimised and mitigation, and that residual risk is managed. London Plan Policy SI13 sets out the development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to the source as possible by following the drainage hierarchy.
- 7.176. Development Management Policies DPD Policy DM6.6 requires schemes to demonstrate that SuDS have been incorporated and that the flood risk has been assessed.
- 7.177. Such requirements are also carried forward in Draft Local Plan Policies S8 and S9.
- 7.178. The planning application is accompanied by a Flood Risk Assessment (FRA) prepared by Waterman. This confirms that the Site is located in Flood Zone 1 (low risk) and the development will not lead to increased flood risk elsewhere.
- 7.179. The development includes significant regrading of land levels and the use of Sustainable Urban Drainage Systems including permeable paving, green roofs and rain gardens which will be fully incorporated into the landscaping design. Further details are provided in the Open Space and Recreation Assessment and Landscape Design Strategy. The development has followed the drainage hierarchy and runoff from the Site is proposed to be restricted to greenfield rates for all events up to and including the 1 in 100 year rainfall event in line with planning policy.
- 7.180. The development therefore complies with London Plan Policies SI12 and SI13, Development Management Policies DPD Policy DM6.6 and Draft Local Plan Policies S8 and S9.

### **Fire**

- 7.181. London Plan Policy D12 requires all major development proposals to be submitted with a Fire Statement.
- 7.182. The Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 came into force on 1<sup>st</sup> August 2021 and introduces a requirement for applications for certain types of development to be accompanied by a Fire Statement. The Fire Statements are required to be submitted on a [form published by the Secretary of State](#) (or a form to similar effect). A Fire Statement accompanies the planning submission and has been prepared in accordance with this requirement.
- 7.183. The development therefore complies with the Order and London Plan Policy D12.

### **Planning Obligations**

7.184. The NPPF (2021) states planning obligations must only be sought where they meet all of the following tests:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

7.185. The following Heads of Terms are proposed based upon LBI Planning Obligations (Section 106) SPD (2016) and pre-application discussions with LBI Officers. These, and any further Heads of Terms, will be subject to further discussion with LBI Officers, GLA and TfL during the application determination period.

### **Construction**

- Provision of on-site skills hub/classroom for the construction period to support green skills training and other construction training.
- Code of Construction Practice and Monitoring Fee.
- Host 'Meet the Buyer' events with local businesses to discuss packages available.
- Provide procurement training to help local business by 'tender ready'.
- List opportunities on CompeteFor.com, which is an inclusive local procurement platform.

### **Employment**

- Code of Employment and Training.
- Employment and training (Construction phase) – Provision of 51 no. 26-week apprenticeship placements, with a target for 30% of apprentices to women.
- Employment and Training (Operation of Development) contribution.
- Code of Local Procurement.
- Provide a range of employment policies through supply chain to promote: diversity and inclusion; continuous professional development; well-being; net zero (e.g. cycle to work); and flexible and part-time working where the role permits.

- Work in partnership with LBI's employment brokerage service to advertise and promote all opportunities onsite.

### **Housing**

- Affordable housing and Early-Stage Review Mechanism.
- Extra Care housing.
- Marketing wheelchair homes.

### **Women's Building**

- Women's Building delivery.

### **Highways**

- Trecastle Connection
- Connection ready for Crayford Road and Bakersfield Estate.
- Highways and Footways reinstatement.
- S278 Agreement.
- TfL Bus Contribution.
- Removal of eligibility for resident's parking permits.
- Accessible parking and transport contribution.
- Travel Plan.

### **Sustainability**

- Carbon Off-set Payment.
- Green Performance Plan.

### **CIL**

7.186. LBI's Charging Schedule took effect on 1st September 2014. The CIL rate is split by location and by use. The site is located in Charging Area B, and the rates which are relevant to the proposed development are as follows:

- Residential: £250 per sqm
- Retail: £125 per sqm
- Non-residential institutions: £0 (NIL) per sqm

7.187. Mayoral CIL2 took effect on 1<sup>st</sup> April 2019. LB Islington is identified as a Band 1 borough within the MCIL2 Charging Schedule. The charge is £80 per sqm.

7.188. CIL charges will be subject to indexation.

7.189. A completed CIL Additional Information Form (Form 1) is submitted with the application.

## 8. Environmental Statement

8.1 The Holloway Prison development is considered EIA development under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

8.2 This application is subject to an Environmental Statement (ES) submitted under Regulation 9 of the Town and Country Planning Act (Environmental Impact Assessment) Regulations 2015.

8.3 The contents of the Environmental Statement follow the outcome of the EIA Scoping Opinion (ref: P2020/1244/EIA) which was determined on 20<sup>th</sup> July 2020. The Environmental Statement captures the following Chapters in which the effect of the development under the relevant topics are discussed:

- ES Volume 1, Chapter 1: Introduction
- ES Volume 1, Chapter 2: EIA Methodology
- ES Volume 1, Chapter 3: Existing Land Uses and Activities
- ES Volume 1, Chapter 4: Alternatives
- ES Volume 1, Chapter 5: The Development
- ES Volume 1, Chapter 6: The Works
- ES Volume 1, Chapter 7: Socio-economics
- ES Volume 1, Chapter 8: Air Quality
- ES Volume 1, Chapter 9: Noise and Vibration
- ES Volume 1, Chapter 10: Ecology
- ES Volume 1, Chapter 11: Wind Microclimate
- ES volume 1, Chapter 12: Daylight Sunlight and Overshadowing
- ES Volume 1, Chapter 13: Greenhouse Gasses
- ES Volume 1, Chapter 14: Effect Interactions

8.4 To provide the reader with a summarised and easy to understand form of the Environmental Statement, the document includes a Non-Technical Summary (NTS) within Volume 4. The Environmental Statement also contains a full Townscape, Visual and Above Ground Heritage Assessment at Volume 2 and appendices to support Chapters 1 to 13 in Volume 3.

## 9. Conclusion

9.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the development Plan unless material considerations indicate otherwise.

9.2 The full description of the proposed development ('the development') is:

*'Phased comprehensive redevelopment including demolition of existing structures; site preparation and enabling works; and the construction of 985 residential homes including 60 extra care homes (Use Class C3), a Women's Building (Use Class F.2) and flexible commercial floorspace (Use Class E) in buildings of up to 14 storeys in height; highways/access works; landscaping; pedestrian and cycle connections, publicly accessible park; car (blue badge) and cycle parking; and other associated works.'*

9.3 The proposal is the outcome of a rigorous design process, including pre-application meetings with LBI, the GLA, TfL and Islington Design Review Panel and consultation events with local stakeholders. In addition, the design has incorporated specialist advice with regards to air quality, ecology, daylight and sunlight, construction methods, energy and sustainability, fire, flooding, noise, transport, wind and townscape and heritage.

9.4 We consider that the development proposal will bring a number of key public benefits as follows:

- Optimisation of the development potential of the Site in line with the NPPF and London Plan objectives;
- Redevelopment of a vacant brownfield site within a highly accessible location and residential context that would assist LBI in meeting its aspirations for redevelopment of the Site as set out in the Holloway Prison Site SPD (2018) and the emerging site allocation NH7 in the Draft LBI Local Plan (2019, as modified 2021);
- Provision of 985 new residential units (60% of which are affordable) which contributes to LBI and London-wide housing and affordable housing targets;
- Provision of extra care housing;
- Provision of 12% wheelchair housing;
- A mix of 1 to 4 bedroom homes, including 696 family homes (2+ bedroom);

- Provision of a 1,489sqm Women's Building, which exceeds the size sought in LBI's Holloway Women's Building Development Brief (June 2020);
- Provision of 1,822sqm flexible commercial floorspace, split across a range of unit sizes;
- Creation of between 46 and 269 full time equivalent (FTE) permanent jobs, subject to the end users/occupiers of the commercial units and the Women's Building, and additional jobs during the construction phase of the development;
- Provision of a new pedestrian and cycle connection to Trecastle Way;
- Improvements to the existing pedestrian crossing to Camden Road;
- The creation of landscaped publicly accessible space, including a central Public Garden, with publicly accessible play space, retained existing mature trees and new planting;
- S106 obligations including provision of 51 apprentice placements with a target for 30% of apprentices to be held by women; provision of an on-site training hub for the duration of the construction period for green skills training; provision of procurement training to help local business be 'tender ready'; and hosting of 'Meet the Buyer' events with local businesses to discuss work packages available; and
- LBI and Mayoral CIL contributions.

9.5 This Planning Statement demonstrates that the development complies with the development plan viewed as a whole, and it should therefore be approved without delay.

# Appendix I

## Surrounding Sites



Site	Application ref	Description of development	Status
273 Camden Road	P2015/5306/FUL	Demolition of existing building and erection of a 6-storey building to provide 21 residential units (8 x 1-bed, 12 x 2-bed and 1 x 3-bedroom flats) with associated landscaping and amenity space.	Approved 26.05.17  Development completed July 2020.
275 Camden Road (John Barnes/ Bramber House) Now known as Cat & Mouse Library	P2013/4758/FUL	Demolition of existing John Barnes Library building and redevelopment of the site to re-provide a Library and provide residential dwellings through the erection of two buildings on the site. Building A is a L shaped building fronting onto Camden Road which is part 6, 5 and 4 storey's in height. Building B is a freestanding part 4 and 3 storey building at the rear of the site in the vicinity of the location of the recently demolished Bramber House. The proposal comprises of 34 residential units and includes the provision of a central amenity space on the site and other landscaping works.	Approved 19.08.14  Development complete.
394 Camden Road	P2018/4071/FUL	Increase in floorspace through creation of 449.6 sqm of floorspace at mezzanine level. Retrospective change of use and subdivision of warehouse building from Use Class B8 to flexible employment Sui Generis uses and Use Class B1. Provision of new metal roof panel - Kingspan KS1000 RW Trapezoidal; Provision of 20 cycle spaces; Construction of canopy and post boxes at entrance to warehouse building and reduction size of opening on Hillmarton Road elevation.	Registered 15.08.19 Committee is scheduled for 27.07.21
1 Dalmeny Avenue (Ada Lewis House)	P2013/1564/FUL	Demolition of existing hostel building on the site and the construction of part 5, part 6 storey residential building providing 45 residential dwellings. Associated landscaping, hardstanding and access alterations/works.	Appeal Allowed 01.10.14 Development is complete and occupied
Dalmeny Road and Carleton Road (Tufnell Park Primary School)	P2017/2822/FUL	Demolition of the existing school buildings and erection of a new part two/part three-storey primary school building in brick along with associated landscaping works including the removal/replacement of trees, provision of new play space and multi-use games area, alterations to the existing site fencing/boundaries, provision of a refuse store, alterations to existing parking, as well as the provision of a temporary two-storey building in the north western corner of the site for use as classrooms during the construction process [Revised Drawings]	Approved 22.02.18 Development is complete and occupied

443-449 Holloway Road	P2013/3213/FUL	Refurbishment of and extension to 443-445 Holloway Road, demolition of Units A-G 449 Holloway Road and development of three new buildings to provide 2,267sqm. of replacement D1 floorspace (National Youth Theatre), 80 new residential units (use Class C3) and 401 sqm. of flexible commercial floorspace (use Class A1/A3/B1) along with associated highways works, car and cycle parking, landscaping and plant room. Associated Conservation area consent reference P2013/3215 has also been considered.	Approved 13.06.14
443-449 Holloway Road	P2020/2470/FUL	Change of use of second floor from storage and distribution (Use Class B8) to office (Use Class E).	Approved 18.12.20
2 Parkhurst Road (Islington Arts Factory)	P2015/0330/FUL	Redevelopment of the site consisting of demolition of the existing garage structure, refurbishment of the Grade II listed former Verger's Cottage and former Sunday School building to provide 413 square metres (GIA) of office floorspace (Use Class B1), refurbishment and conversion of the Church building to provide 7 private residential units (2 x 1-bed, 4 x 2-bed and 1 x 3-bed) and construction of a new 5-storey building with basement below to provide 792 square metres (GIA) of community floorspace (Use Class D1) and ancillary cafe, 132 square metres of office floorspace (Use Class B1) and 18 affordable residential units (7 x 1 bed, 9 x 2 bed and 2 x 3 bed), resulting in a total of 25 residential units (9 x 1-bed, 13 x 2-bed and 3 x 3-bed), along with associated landscaping, access, parking and public realm works. This application may affect the character and appearance of the conservation area and setting of a listed building. Town and Country Planning (Listed Building and Conservation Areas) Act 1990 (as amended); [Revised Description] [In association with Listed Building Consent Application P2016/5054/LBC].	Resolution to Grant 20.06.17 Decision has not been Issued
65-69 Parkhurst Road (Former Territorial Army Centre)	P2020/0648/FUL	Redevelopment of site to provide 118 residential units in buildings ranging from 3 to 6 storeys in height, accessible car parking, cycle parking, landscaping and other associated development	Approved 28.07.20 Development has commenced.

**Appendix II**  
**Social Value Self-Assessment Form**

# Social Value Self-Assessment Form

## Draft Local Plan (2019, as modified 2021)

This form is completed on behalf of Peabody with respect to their role as applicant for the redevelopment proposals for the Former Holloway Prison. The development provides residential units, including Extra Care housing, and ancillary residential spaces, a Women’s Building and flexible commercial space. The responses in this form relate solely to Peabody, and where specified their appointed contractor London Square, and do not relate to or bind any future occupiers of the residential units, ancillary residential spaces, Women’s Building or flexible commercial space with respect to any of the matters listed below.

Ref	Social Value Benefit	Will benefit be delivered by proposal?	How will benefit be delivered and sustained?
1	All employees, apprentices and sub-contractors engaged in the development are paid an hourly wage (or equivalent of an hourly wage) in line with the Living Wage Foundation guidelines	Yes, where relevant.	All employees, apprentices and sub-contractors appointed by Peabody or their contractor London Square in relation to the redevelopment of the Former Holloway Prison will be paid an hourly wage (or equivalent of an hourly wage) in accordance with relevant legislation. Where relevant, the wage will be in line with the Living Wage Foundation guidelines. The wages of apprentices will be discussed with the Council during the preparation of S106 obligations.
2	No policy or practice which ‘blacklists’ employees or contractors engaged in trade union or employee representation activities or political disputes	Yes	Peabody does not have any policies or practices which ‘blacklists’ employees or contractors engaged in trade union or employee representation activities or political disputes.
3	Diversity and inclusion policies are put in place to promote an inclusive workplace, particularly proactive inclusion of under-represented groups.	Yes	Peabody, and their appointed contractor London Square, have existing diversity and inclusion policies in place. The development will target a minimum of 30% of apprentices to women to support the inclusion of women in the construction industry. Peabody is a founding member of the Women’s Trade Network which will assist in delivering this ambitious target.
4	Develop and implement environmental policies and practices to protect the local environment and address the wider challenges of climate change, by preventing or minimising direct and	Yes	The following documents are submitted with the application which demonstrate Peabody’s commitment to preventing or minimising direct and indirect impacts of the development throughout its lifecycle.

	indirect impacts of the development throughout its lifecycle.		<ul style="list-style-type: none"> <li>• Construction Environmental Management Plan</li> <li>• Site Waste Management Plan</li> <li>• Circular Economy Statement</li> <li>• Sustainable Design &amp; Construction Statement, incorporating a Whole Life Cycle Carbon Assessment, Green Performance Plan, Overheating Assessment and Energy Statement.</li> </ul> <p>In addition, Peabody is happy to secure monitoring of the Green Performance Plan indicators by way of S106 obligation.</p>
5	Promote a range of health and wellbeing policies for employees, including flexible working, mental wellbeing and parental/caring responsibilities leave.	Yes	Peabody, and their appointed contractor London Square, will provide a range of employment policies through supply chain to promote: diversity and inclusion; continuous professional development; well-being; net zero (e.g. cycle to work); and flexible and part-time working where the role permits.
6	Enable and support a diverse supply chain through proactive engagement with micro, small and medium businesses, by offering business development support and pre-procurement mentoring.	Yes	Peabody, and their appointed contractor London Square, will undertake the following to enable and support a diverse supply chain: <ul style="list-style-type: none"> <li>• Host 'Meet the Buyer' events with local businesses to discuss packages available.</li> <li>• Provide procurement training to help local business by 'tender ready'.</li> <li>• List opportunities on CompeteFor.com, which is an inclusive local procurement platform.</li> </ul>
7	Facilitate skills and employability programmes to enable local residents to benefit from employment opportunities provided by the development over its lifecycle.	Yes	Peabody, and their appointed contractor London Square, will provide on-site skills hub/classroom for the construction period to support green skills training and other construction training. A total of 51 apprentice placements (each for 26-weeks) will be provided over the construction period.
8	Promote and implement flexible and accessible work placements and schemes to help people who might find it difficult to keep a job or return to work; this includes people with mental health issues or learning difficulties, care leavers or ex-offenders.	Yes	Peabody, and their appointed contractor London Square, will provide a range of employment policies through supply chain to promote: diversity and inclusion; continuous professional development; well-being; net zero (e.g. cycle to work); and flexible and part-time working where the role permits.
9	Support voluntary/community organisations with specialist support, mentoring, skill-sharing and by running practical workshops or enterprise clubs.	Yes	Peabody is looking to become an Islington Anchor Institution, and provides a number of programmes, including the below, which are envisaged to continue as the development scheme is delivered: <ul style="list-style-type: none"> <li>• 'Young Ambassadors' Offer' ;a programme focuses on giving young people a set of tools to</li> </ul>

			<p>design programmes that respond to a challenge of their choice</p> <ul style="list-style-type: none"> <li>Enterprise Development Support; tailored support to match the needs of residents including providing space, training, support and opportunity for enterprises ensuring they have the best possible chance of success.</li> </ul>
10	Promote ethical financial and investment practices, including prompt payment for small and medium enterprises.	Yes	Peabody, and their appointed contractor London Square, have existing payment policies in place to ensure prompt payment of all parties directly appointed by them.
11	Provide career tasters, work placements and other contributions which help meet the target for every school pupil to receive 100 hours experience of the world of work by the age of 16.	Yes	Peabody provides 'Career Ready' placements (intensive programme of internship, mentoring, masterclasses and workplace visits) for young people at risk of NEET.
12	Support employee engagement to continually improve the workplace environment.	Yes	Peabody, and their appointed contractor London Square, will provide a range of employment policies through supply chain to promote: diversity and inclusion; continuous professional development; well-being; net zero (e.g. cycle to work); and flexible and part-time working where the role permits. Peabody, and their appointed contractor London Square, welcome employee engagement to understand how well employment practices are meeting employee needs and how these could be improved.
13	Prioritise the development's supply chain expenditure within the sub-regional economy, to retain as much supply chain benefit as possible within the local area.	Yes	Peabody, and their appointed contractor London Square, will undertake the following to support the local supply chain: <ul style="list-style-type: none"> <li>Host 'Meet the Buyer' events with local businesses to discuss packages available.</li> <li>Provide procurement training to help local business by 'tender ready'.</li> <li>List opportunities on CompeteFor.com, which is an inclusive local procurement platform.</li> </ul>
14	Carry out environmental improvement works to design out crime and reduce the likelihood of ASB and fear of crime, and take an active part in relevant Environmental Visual Audits to inform improvements.	Yes	The development has been designed in accordance with the Building Regulations Part Q as detailed in the Design and Access Statement and following advice of the Met Police Designing Out Crime Officer received at pre-application stage. Peabody will retain management responsibility for the communal and public open spaces and internal road within the Site and will undertake improvement works as and when is deemed necessary to ensure appropriate levels of security within the Site, and to

			reduce the likelihood of ASB and fear of crime.
15	Promote low carbon behaviour in the operation and use of the building to reduce carbon emissions.	No	<p>The following documents are submitted with the application which demonstrate Peabody's commitment to preventing or minimising direct and indirect impacts of the development throughout its lifecycle including in relation to carbon.</p> <ul style="list-style-type: none"> <li>• Construction Environmental Management Plan</li> <li>• Site Waste Management Plan</li> <li>• Circular Economy Statement</li> <li>• Sustainable Design &amp; Construction Statement, incorporating a Whole Life Cycle Carbon Assessment, Green Performance Plan, Overheating Assessment and Energy Statement.</li> </ul> <p>Peabody will provide all initial residents with a home user guide which will encourage low carbon behaviour in the operation of the homes. However, as Peabody will not be the final occupier of all the uses within the development, they cannot control the behaviours of future occupiers with respect to carbon.</p>
Additional	<ul style="list-style-type: none"> <li>• Provision of 985 new residential units;</li> <li>• Provision of 60% affordable housing (by unit), equating to 593 units. The tenure split of the affordable housing is 70% social rent (415 units), with rent set at Target Rent levels, and 30% London Shared Ownership (178 units);</li> <li>• Provision of extra care housing;</li> <li>• Provision of 12% wheelchair housing;</li> <li>• A mix of 1 to 4 bedroom homes, including 696 family homes (2+ bedroom);</li> <li>• Provision of a 1,489sqm Women's Building, which exceeds the size sought in LBI's Holloway Women's Building Development Brief (June 2020);</li> <li>• Provision of 1,822sqm flexible commercial floorspace, split across a range of unit sizes;</li> <li>• Provision of a new pedestrian and cycle connection to Trecastle Way;</li> <li>• Improvements to the existing pedestrian crossing to Camden Road;</li> <li>• The creation of landscaped publicly accessible space, including a central Public Garden, with publicly accessible play space, retained existing mature trees and new planting.</li> </ul>	Yes	These items are delivered by the development.

# **Appendix III**

## **Assessment against London Plan (2021) Policies**



# Former Holloway Prison

## Assessment against London Plan (2021) Policies

Policy	Policy Title	London Plan (2021) Policy	Assessment
<b>Chapter 1 - Planning London's Future - Good Growth</b>			
<b>GG1</b>	<b>Building Strong and Inclusive Communities</b>	Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:	Although this Policy is particularly broad in its scope and objectives, the proposed development meets a number of Policy targets as set out below. The planning application is also accompanied by an Equality Impact Assessment.
		A) encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies	Peabody entered into a PPA with London Borough Islington (LBI) in 2019 and has engaged in extensive pre-application discussions since this time, including with LBI and the GLA, Islington Design Review Panel, Members, as well as a comprehensive public consultation and stakeholder engagement. Further detail of this is included in the Design and Access Statement.
		B) seek to ensure changes to the physical environment to achieve an overall positive contribution to London	The development will achieve a positive contribution to London and will deliver a significant number of public benefits, including: <ul style="list-style-type: none"> <li>• Optimisation of the development potential of the Site in line with the NPPF and London Plan objectives;</li> <li>• Redevelopment of a vacant brownfield site within a highly accessible location and residential context that would assist LBI in meeting its aspirations for redevelopment of the Site as set out in the Holloway</li> </ul>

Policy	Policy Title	London Plan (2021) Policy	Assessment
			<p>Prison Site SPD (2018) and the emerging site allocation NH7 in the Draft LBI Local Plan (2019, as modified 2021);</p> <ul style="list-style-type: none"> <li>• Provision of 985 new residential units (60% of which are affordable) which contributes to LBI and London-wide housing and affordable housing targets;</li> <li>• Provision of extra care housing;</li> <li>• Provision of 12% wheelchair housing;</li> <li>• A mix of 1 to 4 bedroom homes, including 696 family homes (2+ bedroom);</li> <li>• Provision of a 1,489sqm Women’s Building, which exceeds the size sought in LBI’s Holloway Women’s Building Development Brief (June 2020);</li> <li>• Provision of 1,822sqm flexible commercial floorspace, split across a range of unit sizes;</li> <li>• Creation of between 46 and 269 full time equivalent (FTE) permanent jobs, subject to the end users/occupiers of the commercial units and the Women’s Building, and additional jobs during the construction phase of the development;</li> <li>• Provision of a new pedestrian and cycle connection to Trecastle Way;</li> <li>• Improvements to the existing pedestrian crossing to Camden Road;</li> <li>• The creation of landscaped publicly accessible space, including a central Public Garden, with publicly accessible play space, retained existing mature trees and new planting;</li> <li>• S106 obligations including provision of 51 apprentice placements with a target for 30% of apprentices to be held by women; provision of an on-site training hub for the duration of the construction period for green skills training; provision of procurement training to help local business be ‘tender ready’; and hosting of ‘Meet the Buyer’ events with local businesses to discuss work packages available; and</li> <li>• LBI and Mayoral CIL contributions.</li> </ul>

Policy	Policy Title	London Plan (2021) Policy	Assessment
		C) provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation	The development will provide access to high quality community spaces, amenities and infrastructure through the creation of a number of public open spaces and a Women's Building.
		D) seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city	The development includes the creation of between 46 and 269 full time equivalent (FTE) permanent jobs, subject to the end users/occupiers of the commercial units and the Women's Building, and additional jobs during the construction phase of the development.
		E) ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage community buy-in, and where communities can develop and thrive	The development has been designed to allow people to move around safely and comfortably and has incorporated the principles of inclusive design to encourage a sense of community.
		F) promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for building relationships during the daytime, evening and night time	The Site is not located in a town centre. Notwithstanding this, the development includes 1,822sqm of flexible commercial floorspace which has been assessed sequentially to ensure there is no negative impact of this on surrounding town centres.
		G) ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements	The development has been designed to enhance the identity, legibility, permeability and inclusivity of the neighbourhood, whilst being resilient and adaptable to changing community requirements. For instance, the proposed commercial floorspace has been designed to be flexible and accommodate a range of uses (Use Class E).
		H) support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation	<p>The development accords with the principles of Inclusive Design and has been designed to cater for a range of people including younger people, older people and people with young children, as well as people with other protected characteristics. the development includes the following characteristics:</p> <ul style="list-style-type: none"> <li>• The development includes a range of residential accommodation offering different types, sizes and tenure of units, including 60% affordable housing</li> <li>• The development proposes 60 Extra-Care Units specifically designed for Older People.</li> </ul>

Policy	Policy Title	London Plan (2021) Policy	Assessment
		<p>l) support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.</p>	<ul style="list-style-type: none"> <li>• The development includes 12% wheelchair accessible units (M4(3)) and has been designed to cater for people with differing levels of mobility</li> <li>• The development also includes a large amount of play space to cater for different age groups integrated into the landscaping scheme through a series of publicly accessible and communal gardens.</li> <li>• The development also includes a Women’s Building. The facility incorporates safe space to support women in the criminal justice system and services for women. The Women’s Building provides an active frontage on Parkhurst Road and Plot C has been designed to provide a celebratory, open, and inviting frontage. Internally, the Women’s Building has been designed flexibly to enable the space to meet the needs of future operators.</li> </ul> <p>As above, the development seeks to support and promote the creation of an inclusive London.</p>
<b>GG2</b>	<b>Making the Best Use of Land</b>	<p>To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:</p> <p>A) enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites</p> <p>B) prioritise sites which are well-connected by existing or planned public transport</p> <p>C) proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling</p>	<p>The development seeks to make the best use of land in line with Policy GG2 as follows:</p> <p>The development enables the development of brownfield land on surplus public sector land in a highly-accessible location.</p> <p>The Site has a Public Transport Accessibility Level (PTAL) of 6a (‘excellent’). There are a number of bus stops in the vicinity, including one immediately in front of the Site, providing services to Wood Green, Hackney Central, Mornington Crescent and Trafalgar Square. There are also a number of rail stations within around a 15 minute walk from the Site including Holloway Station, Caledonian Road and Tufnell Park Stations.</p> <p>The pre-application design evolution sought to explore the potential to intensify the use of land whilst having regard to the site-specific characteristics and constraints.</p>

Policy	Policy Title	London Plan (2021) Policy	Assessment
		D) applying a design-led approach to determine the optimum development capacity of sites	The development has followed a design-led approach to determine the optimum development capacity of the Site as per London Plan Policy D3.
		E) understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character	The development is on the Site of the former HMP Holloway Prison, and the design team has sought to understand what is valued about the existing site and use this as a catalyst for growth, renewal and place-making. Examples of this include the provision of a Women's Building as part of the development and the retention of a Category A tree which has direct links to the former prison's history.
		F) protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible	Landscaping has been central to the proposed design and the development includes a series of new green infrastructure and urban greening. The development secures a net gain in biodiversity.
		G) plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth	The development approach has been based on connecting to the wider landscape, reducing cars and prioritising people, creating a place for people and using ecology to define spatial types. The development is proposed as 'car-free' with the provision of Blue Badge parking spaces only and promotes a variety of sustainable transport modes in order to support the London Plan's strategic target of 80 per cent of all journeys using sustainable travel.
		H) maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.	The development includes a mix of land uses, including commercial floorspace which has been designed to be flexible to accommodate a range of uses.
<b>GG3</b>	<b>Creating a Healthy City</b>	To improve Londoners' health and reduce health inequalities, those involved in planning and development must:	The development seeks to improve health and reduce health inequalities as set out below:
		A) ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities	The development seeks to reduce health inequalities as set out below:
		B) promote more active and healthy lives for all Londoners and enable them to make healthy choices	The development is proposed as 'car-free' with the provision of Blue Badge parking spaces only and seeks to promote and improve a series of sustainable transport modes in order to promote a more active and healthier lifestyle.
		C) use the Healthy Streets Approach to prioritise health in all planning decisions	A Healthy Streets Transport Assessment is submitted with this planning application and sets out how the development complies with the Healthy Streets Approach.

Policy	Policy Title	London Plan (2021) Policy	Assessment
		D) assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments	The planning application is accompanied by a Health Impact Assessment prepared by WSP.
		E) plan for appropriate health and care infrastructure to address the needs of London's changing and growing population	The development includes 60 Extra-Care Units which have been designed specifically for older people to allow people to remain in their own homes for longer.
		F) seek to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution	The planning application is accompanied by an Air Quality Assessment prepared by Air Quality Consultants.
		G) plan for improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports	The development incorporates a large amount of public open green spaces and new green infrastructure, including a large amount of play space for all ages.
		H) ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold	The residential accommodation proposed has been designed to the highest standards to ensure it is well-insulated and sufficiently ventilated.
		I) seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.	The development does not propose any fast food outlets.
<b>GG4</b>	<b>Delivering the Homes Londoners Need</b>	To create a housing market that works better for all Londoners, those involved in planning and development must:	The development seeks to contribute towards creating a housing market that works for all Londoner as follows:
		A) ensure that more homes are delivered	The development comprises 985 new homes, across a range of sizes and tenures and will contribute to increasing housing delivery in the borough and in London.
		B) support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable	The development includes the provision of 60% affordable housing, thus contributing to the strategic target of 50% of all new homes being genuinely affordable.
		C) create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing	The development contributes to the creation of mixed and inclusive communities through the provision of high quality homes, including the provision of 60 Extra-Care units to meet an identified need.
		D) identify and allocate a range of sites to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset	The Site is identified as a key housing site in the borough.
		E) establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.	The development represents a deliverable scheme which will allow these units to be delivered in a short timeframe.

Policy	Policy Title	London Plan (2021) Policy	Assessment
GG5	Growing a Good Economy	To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:	The development seeks to contribute towards London's economy as follows:
		A) promote the strength and potential of the wider city region	Due to the strategic nature, this part of Policy GG5 is not relevant.
		B) seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London	Due to the strategic nature, this part of Policy GG5 is not relevant.
		C) plan for sufficient employment and industrial space in the right locations to support economic development and regeneration	The development comprises non-residential floorspace which may generate between 46 and 269 gross full time equivalent (FTE) permanent jobs. This is expressed as a range given the employment generation could vary within the flexible Class E commercial space and within the Women's Building and reflects the minimum and maximum estimated job creation for the scheme. The job creation covers the following uses across the scheme: <ul style="list-style-type: none"> <li>• Women's Building</li> <li>• Flexible Class E commercial floorspace</li> <li>• Employment from the Extra Care homes</li> <li>• Employment from Plot D residents facilities incl. concierge</li> </ul>
		D) ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth	The development comprises 985 new residential units, including 60% affordable housing.
		E) ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning	This part of the policy is not relevant to the proposed development.
		F) promote and support London's rich heritage and cultural assets, and its role as a 24-hour city	The development seeks to support London's heritage and cultural assets and seeks to draw on the legacy of the former Holloway Prison in the design. The commercial floorspace proposed will also provide active uses at different times of the day, contributing to London's role as a 24-hour city.
		G) make the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity	The Site is highly accessible by walking, cycling and public transport and the development seeks to enhance local connections.
		H) recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success.	The development has been designed in accordance with the principles of the circular economy and whole-life cycle carbon.

Policy	Policy Title	London Plan (2021) Policy	Assessment
<b>GG6</b>	<b>Increasing Efficiency and Resilience</b>	To help London become a more efficient and resilient city, those involved in planning and development must:	The development contributes towards London becoming a more efficient and resilient city as follows:
		A) seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zerocarbon city by 2050	The development will contribute towards the low carbon circular economy, helping achieve the zero carbon city targets.
		B) ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect	The development has been designed to adapt to changing climate, flood requirements and make efficient use of water. The layout of the development will avoid contributions to the urban heat island effect.
		C) create a safe and secure environment which is resilient the impact of emergencies including fire and terrorism	The development has been designed in accordance with the principles of Secure by Design and the application is accompanied by a Fire Statement, prepared by FDS, to demonstrate the how the proposals are resilient to the impact of fire.
		D) take an integrated and smart approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.	The development has undergone an iterative design process including engagement of numerous stakeholders. Further detail of this is included in the Design and Access Statement.
<b>Chapter 2 – Spatial Development Patterns</b>			
<b>SD1</b>	<b>Opportunity Areas</b>	The Site is not located in an Opportunity Area and therefore this Policy is not relevant to the proposals.	
<b>SD2</b>	<b>Collaboration in the Wider South East</b>	Given the strategic nature of this Policy, is not relevant to the proposals.	
<b>SD3</b>	<b>Growth Locations in the Wider SE and beyond</b>	Given the strategic nature of this Policy, is not relevant to the proposals.	
<b>SD4</b>	<b>The CAZ</b>	The Site is not located in the Central Activities Zone and therefore this Policy is not relevant to the proposals.	
<b>SD5</b>	<b>Offices, other strategic functions and residential development in the CAZ</b>	The Site is not located in the Central Activities Zone and therefore this Policy is not relevant to the proposals.	



Policy	Policy Title	London Plan (2021) Policy	Assessment
<b>SD6</b>	<b>Town Centres and High Streets</b>	The Site is not located in a Town Centre and therefore this Policy is of limited relevance.	
<b>SD7</b>	<b>Town Centres: development principles and Development Plan Documents</b>	<p>A) When considering development proposals, boroughs should take a town centres first approach, discouraging out-of-centre development of main town centre uses in accordance with Parts A1 - A3, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices). Boroughs should:</p> <ol style="list-style-type: none"> <li>1) apply the sequential test to applications for main town centre uses, requiring them to be located in town centres. If no suitable town centre sites are available or expected to become available within a reasonable period, consideration should be given to sites on the edge-of-centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport. Out-of-centre sites should only be considered if it is demonstrated that no suitable sites are (or are expected to become) available within town centre or edge of centre locations. Applications that fail the sequential test should be refused</li> <li>2) require an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for retail, leisure and office uses that are not in accordance with the development Plan. Applications that are likely to have a significant adverse impact should be refused</li> <li>3) realise the full potential of existing out-of-centre retail and leisure parks to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location unless the proposal is in accordance with the development Plan or can be justified through the sequential test and impact assessment requirements in Parts A(1) and A(2) above.</li> </ol>	<p>The development includes the provision of 1,822sqm Class E floorspace to be provided fronting Parkhurst Road (Plot B) or the Public Garden (Plot C), designed to meet the everyday and essential shopping and service needs of the new resident population and to activate the street frontage along Parkhurst Road.</p> <p>As the Site is not located within a town centre, this planning application is accompanied by a Main Town Centre Uses Impact Assessment prepared by WSP. The scope of this assessment was agreed with LBI during pre-application discussions.</p> <p>The Main Town Centre Uses Impact Assessment concludes that there are no sequentially preferable sites which can appropriately accommodate the proposed floorspace and meet the same needs as the development. Further, the development will not result in significant adverse impact on the vitality and viability of any existing, planned or committed centres within the catchment.</p> <p>Indeed, the proposed floorspace will be largely supported by its new resident population and it is an integral part of a well-designed redevelopment which offers significant benefits for the local community including the regeneration benefits of the re-use of a large, prominent and under-used site; significant local employment opportunities firstly, in its construction and subsequently, in the delivery of Class E floorspace; and important social benefits from the new Women's Building proposed.</p> <p>On this basis, it is considered that the development passes the sequential test and fully complies with Policy SD7.</p>

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		B)	Part B of Policy SD7 relates to the role of Local Authorities and is therefore not relevant to the Proposed development.
		C)	Part C of Policy SD7 relates to the role of Local Authorities and is therefore not relevant to the Proposed development.
		D) Development proposals should: 1) ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment 2) ensure that commercial space is appropriately located having regard to Part A and B above, and is fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing 3) support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents 4) support the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments.	The development includes 1,822sqm of commercial floorspace (Use Class E) which has been designed to a high standard and to be flexible to incorporate a range of uses.  As per London Plan Policy SD7, the location, design and type of the commercial uses has been considered to ensure that the commercial premises make a positive contribution to the vitality of the area and are quickly occupied. The commercial units will be serviced in a way that minimises negative impacts on the environment, public realm, amenity and road safety. Further detail is included within the Waste Management Plan, prepared by WSP, which accompanies this planning application.
<b>SD8</b>	<b>Town Centre Network</b>	The Site is not located in a Town Centre and therefore this Policy is not relevant to the Proposed development.	
<b>SD9</b>	<b>Town Centres: Local partnerships and implementation</b>	The Site is not located in a Town Centre and therefore this Policy is not relevant to the Proposed development.	
<b>SD10</b>	<b>Strategic and Local Regeneration</b>	Given the strategic nature of this Policy, its relevance is limited to the Proposed development.	
<b>Chapter 3 - Design</b>			
<b>D1</b>	<b>London's Form, Character and Capacity for Growth</b>	Boroughs must undertake area assessments to define the characteristics qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. These assessments should be used to meet overall housing targets and identify suitable locations for growth with acceptable standards set out for building heights, scale, massing and indicative layouts for allocated sites, and, where appropriate, the amount of floorspace that should be provided for different land uses.	The London Borough of Islington adopted the Holloway Prison Site SPD in 2018. The SPD includes a number of objectives which the design has sought to positively respond.  The SPD was supported by a Site Capacity Study produced in 2017 which set out illustrative scenarios of how development could come forward on the Site. The SPD confirms the Site

Policy	Policy Title	London Plan (2021) Policy	Assessment
D2	<b>Infrastructure Requirements for Sustainable Densities</b>	<p>A) The density of development proposals should:</p> <ol style="list-style-type: none"> <li>1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels</li> <li>2) be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services)</li> </ol> <p>B) Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.</p> <p>C) When a proposed development is acceptable in terms of use, scale and massing, given the surrounding built form, uses and character, but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.</p>	<p>Capacity Study is illustrative of one way in which the site could be developed according to the key principles identified and noted the final design of any scheme and quantum of development are likely to be different.</p> <p>The density of the development has been informed by following a design-led approach in order to make the best use of land. This has had regard to the high PTAL rating of the Site.</p> <p>Relevant CIL and s106 obligations will be secured as part of the development.</p> <p>Relevant CIL and s106 obligations will be secured as part of the development.</p>
D3	<b>Optimising Site Capacity Through the Design-led Approach</b>	<p><b>The design-led approach</b></p> <ol style="list-style-type: none"> <li>A) All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.</li> <li>B) Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking</li> </ol>	<p>The development has sought to make the best use of land by following a design-led approach in order to optimise the capacity of the Site.</p> <p>The Site is very well connected to jobs, services, infrastructure and amenities by walking, cycling and public</p>

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		<p>and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.</p>	<p>transport (PTAL rating of 6a). The Site is therefore entirely suitable for higher density development.</p>
		<p>C) In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2 Small sites</p>	<p>Part C of Policy D3 is not relevant given as the Site is identified as a location where higher density development should be promoted.</p>
		<p>D) Development proposals should:</p> <p><b>Form and Layout</b></p> <p>1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions</p>	<p>The development seeks to enhance the local context by delivering buildings and spaces that positively respond to local distinctiveness including the Site's characteristics and surrounding context. Consideration of this is provided in the Design and Access Statement.</p>
		<p>2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area</p>	<p>The design approach has been based on reducing cars, prioritising people and encouraging active travel modes. the development is 'car-free' with car parking limited to disabled car parking spaces.</p> <p>The development includes provision of a new pedestrian and cycle connection to Trecastle Way. The development includes an internal residential street which provides vehicular and cycle access. Further detail on Inclusive Access is included within the Design and Access Statement.</p>
		<p>3) be street-based with clearly defined public and private environments</p>	<p>The development proposes a series of spaces throughout the Site which will be well-designed and easy to understand, with clear definition between the public and private space.</p>
		<p>4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users</p>	<p>The development proposes a series of spaces which are easy to understand, service and maintain. The proposed development seeks to facilitate safe, clean and efficient deliveries and servicing which have minimal negative impact on the environment, public realm and vulnerable road users.</p>
		<p><b>Experience</b></p> <p>5) achieve safe, secure and inclusive environments</p>	<p>The development has been designed in accordance with the principles of Secure by Design and accords with the principles of Inclusive Design. It has been designed to cater for a range of people including younger people, older people and people with young children, as well as people with other</p>

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			<p>protected characteristics. the development includes the following characteristics:</p> <ul style="list-style-type: none"> <li>• The development includes a range of residential accommodation offering different types, sizes and tenure of units, including 60% affordable housing</li> <li>• The development proposes 60 Extra-Care Units specifically designed for older people.</li> <li>• The development includes 12% wheelchair accessible units (M4(3)) and has been designed to cater for people with differing levels of mobility</li> <li>• The development also includes a large amount of play space to cater for different age groups integrated into the landscaping scheme through a series of publicly accessible and communal gardens.</li> <li>• The development also includes a Women's Building. The facility incorporates safe space to support women in the criminal justice system and services for women. The Women's Building provides an active frontage on Parkhurst Road and Plot C has been designed to provide a celebratory, open, and inviting frontage. Internally, the Women's Building has been designed flexibly to enable the space to meet the needs of future operators.</li> </ul>
		6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest	The development includes the provision of 1,822sqm Class E floorspace to be provided fronting Parkhurst Road (Plot B) or the Public Garden (Plot C), designed to meet the everyday and essential shopping and service needs of the new resident population and to activate the street frontage along Parkhurst Road.
		7) deliver appropriate outlook, privacy and amenity	The development has been designed to deliver appropriate outlook, privacy and amenity for future residents and existing residents in neighbouring properties. Further detail is included in the Design and Access Statement.
		8) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity	The development includes a large amount of public open spaces which provide for social interaction, play, relaxation and physical activity.
		9) help prevent or mitigate the impacts of noise and poor air quality	The development has been designed to minimise the impacts of noise and poor air quality. The planning

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		<p>10) achieve indoor and outdoor environments that are comfortable and inviting for people to use</p> <p><b>Quality and Character</b></p> <p>11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character</p> <p>12) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well</p> <p>13) aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy</p> <p>14) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.</p> <p>D) Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.</p>	<p>application is accompanied by both a Noise Assessment and Air Quality Assessment which include a number of mitigation measures which have been incorporated into the development.</p> <p>The development seeks to achieve high quality internal and external spaces that are comfortable and inviting for people to use.</p> <p>The development positively responds to the local context and character as detailed within the Design and Access Statement.</p> <p>The development is of a high architectural quality which considers the practicality of use, flexibility, safety and building lifespan. Further detail on the design approach is included in the Design and Access Statement.</p> <p>The development has been designed to achieve high sustainability standards and in accordance with the principles of the circular economy. Further detail is included within the supporting documents including the Design and Access Statement and Circular Economy Statement.</p> <p>Urban Greening has been maximised and the development achieves a score in excess of 0.4. The development also incorporates a number of Sustainable Urban Drainage Systems to manage surface water.</p> <p>The development accords with the emerging site allocation for the Site and the Holloway Prison SPD.</p>
<b>D4</b>	<b>Delivering Good Design</b>	<p><b>Design analysis and development certainty</b></p> <p>A) Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach.</p>	<p>The London Borough of Islington adopted the Holloway Prison Site SPD in 2018. The SPD includes a number of objectives which the design has sought to positively respond. The SPD was supported by a Site Capacity Study produced in 2017 which set out illustrative scenarios of how development could come forward on the Site. The SPD confirms the Site Capacity Study is illustrative of one way in which the site could be developed according to the key principles identified</p>

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			<p>and noted the final design of any scheme and quantum of development are likely to be different. A design led approach has been undertaken to ensure the Site is appropriately optimised.</p>
		<p>B) Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.</p>	<p>The scheme has been shown in townscape views and with illustrative views over the course of the pre-application discussions with Officers. A 3D printed model of the scheme has also been shown to Officers and Members.</p>
		<p><b>Design Scrutiny</b> C) Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.</p>	<p>The planning application is accompanied by a Design and Access Statement prepared by AHMM.</p>
		<p>D) The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E if they:</p> <ol style="list-style-type: none"> <li>1) include a residential component that exceeds 350 units per hectare; or</li> <li>2) propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building.</li> </ol>	<p>Peabody entered into a PPA with LBI in 2019 and has engaged in extensive pre-application discussions since this time. This has involved engagement with LBI, the GLA, Islington Design Review Panel, other statutory consultees alongside public consultation and engagement with Members.</p> <p>With specific regard to the design review process, the development has been presented to the Islington Design Review Panel on five occasions, including a presentation at the DRP Chairs Meeting in September 2021. The development has evolved in response to the feedback from the DRPs and a full response to the comments raised is included in the Design and Access Statement.</p>
		<p>E) The format of design reviews for any development should be agreed with the borough and comply with the Mayor’s guidance on review principles, process and management, ensuring that:</p> <ol style="list-style-type: none"> <li>1) design reviews are carried out transparently by independent experts in relevant disciplines</li> <li>2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme</li> <li>3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews</li> <li>4) design review recommendations are appropriately recorded and communicated to officers and decision makers</li> </ol>	<p>The process for the Design Review Panel was consistent with that set out in Part E of Policy D4.</p>

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		<p>5) schemes show how they have considered and addressed the design review recommendations</p> <p>6) planning decisions demonstrate how design review has been addressed.</p> <p>F) The design quality of development should be retained through to completion by:</p> <p>1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development</p> <p>2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design</p> <p>3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter</p> <p>4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.</p>	<p>The scope of the planning application was agreed prior to submission with LBI. This includes a series of proposed plans and Design and Access Statement to ensure appropriate design detail is provided at this stage.</p>
<p><b>D5</b></p>	<p><b>Inclusive Design</b></p>	<p>A)</p> <p>B) Development proposal should achieve the highest standards of accessible and inclusive design. They should:</p> <p>1) be designed taking into account London's diverse population</p> <p>2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion</p> <p>3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment</p> <p>4) be able to be entered, used and exited safely, easily and with dignity for all</p> <p>5) be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.</p>	<p>Part A of Policy D5 relates to Local Planning Authorities.</p> <p>The planning application is accompanied by an Inclusive Design Statement (included within the Design and Access Statement) which sets out how the proposals have been designed to achieve the highest standards of accessible and inclusive design. This fully accords with Policy D5 as follows:</p> <p>1) The proposals have been designed to take into account London's diverse population. The proposals include a mix of range of residential accommodation types, sizes and tenures with a large proportion of affordable housing. There is also provision for accommodation specifically designed for older people.</p> <p>2) The proposals have been designed in accordance with the Principles of Inclusive Design, including placing people at the heart of the design process and providing buildings and environments that are convenient and enjoyable to use for everyone. Inclusive areas of public realm and play space are proposed throughout the development, designed to engage people of all ages. Accessible seating will be provided adjacent to all play areas and throughout the landscape, with no more than 40m between rest opportunities.</p>



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			<p>3) The site levels are rationalised as far as possible to create accessible entrances. Gently sloping gradients (less steep than 1:20) are proposed wherever possible within the constraints of boundary conditions and existing trees, minimising the installation of steps and ramps. Where the existing level differences between the Site and surrounding pedestrian routes could not be addressed with a gentle slope, ramps no steep than 1:15 are proposed, with adjacent stepped routes and shared level landings. All aspects of the pedestrian routes through the site are designed to meet the criteria of Approved Document M, Volume 2, Category 3A.</p> <p>4) All entrances and communal areas to residential buildings will have finishes that assist people with visual impairments by providing sufficient visual contrast between key surfaces (floors, walls, ceilings and doors) and accessories (door handles, postboxes, dwelling identification, etc) and by minimising visual contrast where necessary to avoid the risk of confusion / discomfort.</p> <p>5) The development has been designed to incorporate safe and dignified emergency evacuation for all building users. There is at least one lift per core and all homes at the seventh floor and above are served by at least two lifts.</p>
		<p>Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement.</p>	<p>As above, the planning application is accompanied by an Inclusive Design Statement included within the Design and Access Statement.</p>
<b>D6</b>	<b>Housing Quality and Standards</b>	<p>(A) Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.</p> <p>(B) Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.</p>	<p>The residential units will achieve all requirements of Policy D6. In the first instance, the development provides adequately sized rooms which are fit for purpose and are adaptable without differing between tenures. the development responds positively to the requirements for layout, orientation and form, outside space and usability and on-going maintenance as per Table 3.2 and provides assurance of the scheme's qualitative aspects.</p>

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			<p>Specifically, the residential accommodation has been designed to be of the highest design quality as follows:</p> <ul style="list-style-type: none"> <li>• All homes will meet or exceed the minimum space standards as set out in the London Plan</li> <li>• All homes have a floor to ceiling height of 2.6m</li> <li>• The amount of dual aspect homes has been maximised</li> <li>• All homes will have dedicated private amenity space in the form of a garden, terrace or balcony which meet or exceed the minimum space standards</li> <li>• 12% of homes will be designed as wheelchair accessible homes across all tenures and types</li> <li>• All homes at the seventh floor and above are served by at least two lifts</li> <li>• There is a maximum of 8 units per core in all plots, apart from the Extra Care which has 12 units per core. This core is generously sized to promote interaction between residents and benefits from natural daylight.</li> <li>• Communal play space has been designed in accordance with Policy S4.</li> </ul>
		<p>(C) Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.</p>	<p>The layout of the development has sought to minimise single aspect units. Where single aspect units are proposed, these are as a result of optimising the site capacity as required by Policy D3. All such single aspect units will achieve adequate levels of passive ventilation, daylight, privacy and will avoid overheating.</p>
		<p>(D) The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.</p>	<p>The design of the development seeks to maximise daylight and sunlight levels whilst optimising the capacity of the site. Overheating and overshadowing is minimised whilst the usability of outside space has been maximised. The planning application is accompanied by a Daylight and Sunlight Assessment prepared by Point 2 Surveyors.</p>
		<p>(E) Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.</p>	<p>Each residential dwelling provides adequate and easily accessible storage space for the collection of refuse, recycling and food waste. Bin numbers have been quantified using residential waste generation metrics detailed within the Guidance. Further detail is provided within the Waste</p>

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		<p>(F) Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.</p> <p><b>Private internal space:</b></p> <ol style="list-style-type: none"> <li>1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.</li> <li>2) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.</li> <li>3) A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.</li> <li>4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m..</li> <li>5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sq.m. within the Gross Internal Area).</li> <li>6) Any other area that is used solely for storage and has a headroom of 0.9- 1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.</li> <li>7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sq.m. in a double bedroom and 0.36 sq.m. in a single bedroom counts towards the built-in storage requirement.</li> <li>8) The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.</li> </ol> <p><b>Private outside Space</b></p> <ol style="list-style-type: none"> <li>9) Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1</li> </ol>	<p>Management Plan (prepared by WSP) that supports this planning application.</p> <p>As confirmed on the accompanying plans, all residential units proposed have been designed in accordance with the space standards set out in Part F of Policy D6 including in terms of the gross internal floor area and built-in storage, bedroom widths and floor-to-ceiling heights.</p> <p>In additional, all residential units have access to private external amenity space which meets or exceeds the minimum space requirements.</p>

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		(G) The Mayor will produce guidance on the implementation of this policy for all housing tenures.	
<b>D7</b>	<b>Accessible Housing</b>	<p>(A) To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:</p> <ol style="list-style-type: none"> <li>1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'</li> <li>2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.</li> </ol>	The proposed development will deliver 12% M4(3) wheelchair accessible provision by unit number across the scheme. The remaining units will be M4(2).
<b>D8</b>	<b>Public Realm</b>	<p>Development proposals should:</p> <p>(A) encourage and explore opportunities to create new public realm where appropriate</p> <p>(B) ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution</p> <p>(C) maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive onstreet parking, which can obstruct people's safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds</p>	<p>Landscaping has been central to the proposed design and the development of a landscape-led masterplan. The approach has been based on connecting to the wider landscape, reducing cars and prioritising people, creating a place for people and using ecology to define spatial types. The key site-based strategies have been to retain the green heart of the site, connect the site to its surroundings and transform a once inward-facing and closed off space into an opening and welcoming space.</p> <p>The development has sought to encourage, explore and maximise opportunities to create new public realm. Further detail is included within the Open Space / Recreation Assessment which accompanies the planning application.</p> <p>The development proposes a series of spaces throughout the Site which will be well-designed, safe, accessible, inclusive, attractive and well-connected within and outside of the Site, relate to the local and historic context of the Site, and which are easy to understand, service and maintain. The landscape treatment, planting, street furniture and surface materials are of a high quality, fit-for-purpose, durable and sustainable. Lighting will be carefully considered and well-designed in order to reduce light pollution.</p> <p>The landscaping approach has been based on reducing cars, prioritising people and encouraging active travel modes. the development is 'car-free' with car parking limited to disabled car parking spaces.</p>

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			The development includes provision of a new pedestrian and cycle connection to Trecastle Way. The development includes an internal residential street which provides vehicular and cycle access. Further detail on Inclusive Access is included within the Design and Access Statement.
		(D) be based on an understanding of how the public realm in an area functions and creates a sense of place during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of how people use the public realm, and the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists	The public realm has been designed to function and create a sense of place during different times of the day and night, days of the week and times of the year. This has been informed by an understanding of how people use the public realm and the types, location and relationship between public spaces in the local area.
		(E) ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, which should be regular, convenient and accessible	The approach to the public realm has been informed through detailed landscape analysis which has allowed for the primary access routes across the site to be situated near to desire lines.
		(F) ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm	The development seeks to create a mutually supportive relationship between the proposed spaces, surrounding buildings and their uses so that the public realm enhances the amenity and function of buildings, and the design of the buildings contributes to a vibrant public realm. This includes through the use of generous floor to ceiling heights in the Women's Building in Plot C, commercial floorspace within Plot B and C and residents' facilities in Plot D.
		(G) ensure buildings are of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm	The development includes active frontages surrounding the public realm in order to define the space and provide natural surveillance. The planning application is accompanied by a Wind and Microclimate assessment, the results of which have informed the design.
		(H) ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter	A Landscape Management Strategy has been prepared by Exterior Architecture in support of the planning application (included in the Open Space and Recreation Assessment and Landscape Design Strategy). This has been developed to ensure the long term management of the landscaped setting while enabling it to contribute positively to the visual

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			amenities of the area and create usable and valued spaces for future users to enjoy.
		(I) incorporate green infrastructure such as street trees and other vegetation into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity	Many existing trees are retained and form the backbone to the new green infrastructure both within the Site and connecting beyond.
		(J) ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place	The landscaping design has been influenced by the results of technical assessment including Daylight Sunlight and Overshadowing, Wind and Microclimate to ensure the development is suitable for the proposed use.
		(K) ensure that street clutter, including street furniture that is poorly located, unsightly, in poor condition or without a clear function is removed, to ensure that pedestrian amenity is improved. Consideration should be given to the use, design and location of street furniture so that it complements the use and function of the space. Applications which seek to introduce unnecessary street furniture should be refused	The proposed street furniture is well considered and seeks to complement the use and function of the space, thus supporting a range of activities.
		(L) explore opportunities for innovative approaches to improving the public realm such as open street events and Play Streets	The development seeks to incorporate incidental play space within the public realm. The development includes play pockets throughout the public realm which will be natural and integrated into the surface treatment. There will also be a natural play trial with interlinked play obstacles in a natural setting.
		(M) create an engaging public realm for people of all ages, with opportunities for social activities, formal and informal play and social interaction during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm	The landscaping scheme has been designed to create an engaging public realm for people of all ages, with opportunities for social activities, formal and informal play and social interaction at all times of the day. Further detail is included in the Open Space and Recreation Assessment and Landscape Design Strategy prepared by Exterior Architecture which accompanies the planning application.
		(N) ensure that any on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Parking should not obstruct pedestrian lines	The development approach has been based on connecting to the wider landscape, reducing cars and prioritising people, creating a place for people and using ecology to define spatial types. The development is proposed as 'car-free' with the provision of Blue Badge parking spaces only and promotes a variety of sustainable transport modes in order to support the strategic target of 80 per cent of all journeys using sustainable travel.

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		(O) ensure the provision and future management of free drinking water at appropriate locations in the new or redeveloped public realm.	This is not proposed as part of the development.
D9	Tall Buildings	<p><b>Definitions</b></p> <p>(A) Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.</p> <p>(B) <b>Locations</b></p> <p>1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.</p> <p>2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.</p> <p>3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.</p> <p><b>Impacts</b></p> <p>(C) Development proposals should address the following impacts:</p> <p><b>1) Visual impacts</b></p> <p>a) the views of buildings from different distances:</p> <p>i) long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views</p> <p>ii) mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality</p> <p>iii) immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.</p> <p>b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding</p> <p>c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan</p>	<p>The development includes buildings over 30m (thereby qualifying as a tall building). An assessment against Policy D9 is included in Section 7 of the Planning Statement.</p>

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		<p>d) proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area</p> <p>e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it</p> <p>f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river</p> <p>g) buildings should not cause adverse reflected glare</p> <p>h) buildings should be designed to minimise light pollution from internal and external lighting</p> <p><b>2) Functional Impacts</b></p> <p>a) the internal and external design, including construction detailing, the building’s materials and its emergency exit routes must ensure the safety of all occupants</p> <p>b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process</p> <p>c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas</p> <p>d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building</p> <p>e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area</p> <p>f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings</p> <p><b>3) Environmental impact</b></p>	



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		<p>a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building</p> <p>b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions</p> <p>c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building</p> <p><b>4) Cumulative impacts</b></p> <p>a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.</p> <p><b>Public access</b></p> <p>(D) Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.</p>	
<b>D10</b>	<b>Basement Development</b>	This Policy is not relevant to the Proposed development as no basements are proposed.	
<b>D11</b>	<b>Safety, security and resilience to emergency</b>	<p>A) The Mayor uses his convening power to work with relevant partners and stakeholders to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register.</p> <p>B) Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.</p> <p>C) Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the</p>	<p>The proposed scheme has been designed in accordance with the Building Regulations Part Q as detailed in the Design and Access Statement and following advice of the Met Police Designing Out Crime Officer received at pre-application stage. This includes incorporating the following measures:</p> <ul style="list-style-type: none"> <li>• Vehicular and pedestrian routes have been designed to ensure that they are visually open, direct and well used;</li> <li>• The communal and play spaces have been designed to allow for natural surveillance from nearby dwellings with safe and accessible routes for users to come and go;</li> <li>• Residential units located to promote natural surveillance;</li> <li>• All street lighting will comply with BS 5489-1:2013;</li> <li>• Communal entrance doors to be specified and in accordance with the requirements of Building Regulations Part B, M and Q;</li> </ul>

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		<p>design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.</p>	<ul style="list-style-type: none"> <li>• Access to each plot will be via a visual door entry and access control system to the outer and inner communal entrance doors, the cycle store doors and refuse store doors;</li> <li>• The Women’s Building has been designed following engagement with key stakeholders with a particular focus on safety. The design has also been informed by the principles of Trauma and these requirements are carefully balanced with the need to provide a safe and secure space for Women as part of the legacy of the history of the site.</li> </ul>
<p><b>D12</b></p>	<p><b>Fire Safety</b></p>	<p>A) In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:</p> <ol style="list-style-type: none"> <li>1) identify suitably positioned unobstructed outside space:               <ol style="list-style-type: none"> <li>a) for fire appliances to be positioned on</li> <li>b) appropriate for use as an evacuation assembly point</li> </ol> </li> <li>2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures</li> <li>3) are constructed in an appropriate way to minimise the risk of fire spread</li> <li>4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users</li> <li>5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in</li> <li>6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.</li> </ol> <p>B) All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal will function in terms of:</p> <ol style="list-style-type: none"> <li>1) the building’s construction: methods, products and materials used, including manufacturers’ details</li> <li>2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach</li> <li>3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans</li> </ol>	<p>The planning application is accompanied by a Fire Statement which has been prepared by a third party, suitably qualified assessor and meets the requirements of Policy D12.</p> <p>The Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 came into force on 1st August 2021 and introduces a requirement for applications for certain types of development to be accompanied by a Fire Statement. The Fire Statements are required to be submitted on a form published by the Secretary of State (or a form to similar effect). A Fire Statement accompanies the planning submission and has been prepared in accordance with this requirement.</p>

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		<p>4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these</p> <p>5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building</p> <p>6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures</p>	
<b>D13</b>	<b>Agent of Change</b>	<p>A) The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby</p> <p>B) Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.</p> <p>C) New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.</p> <p>D) Development proposals should manage noise and other potential nuisances by:</p> <ol style="list-style-type: none"> <li>1) ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area</li> <li>2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations</li> <li>3) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.</li> </ol> <p>E) Boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed.</p>	<p>The development has been considered with due regard to existing noise generating activities or uses on the new noise-sensitive parts of the development. The Site is bounded to the north, west and south by residential properties. These are not considered significant sources of air pollution and/or noise and vibration.</p> <p>There are non-residential uses located on Camden / Parkhurst Road and we do not consider the proposed development will have an impact on these established non-residential uses.</p> <p>The development is largely residential, with some commercial floorspace proposed and a Women's Building. The non-residential elements proposed have been designed to limit the impact on the existing and proposed residential properties through and includes mitigation. The planning application is accompanied by a Noise Assessment.</p> <p>The development demonstrates how noise and other nuisances will be mitigated and managed. Further detail is included in the technical reports which accompany this planning application.</p>

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<b>D14</b>	<b>Noise</b>	<p>A) In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:</p> <ol style="list-style-type: none"> <li>1) avoiding significant adverse noise impacts on health and quality of life</li> <li>2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change</li> <li>3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses</li> <li>4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)</li> <li>5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation</li> <li>6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles</li> <li>7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.</li> </ol>	<p>For the reasons set out in the Noise Chapter of the ES, and the standalone Noise Assessment, the development will avoid significant adverse noise impacts on health and quality of life, whilst existing noise generating uses will not place unreasonable restrictions or impacts upon the development.</p>
		<p>B) Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations.</p>	<p>This part is relevant to local authorities and is therefore not relevant to the proposed development.</p>
<b>Chapter 4 - Housing</b>			
<b>H1</b>	<b>Increasing Housing Supply</b>	<p>The London Plan sets the ten-year targets for net housing completions that each local planning authority should plan for. For Islington the 10-year target for net housing completions (2019/20 – 2028/29) is 7,750.</p>	<p>As above, the proposed development directly, and significantly, contributes to the Council's housing supply requirements. Furthermore, the development optimises the housing delivery on a brownfield site and an underutilised public asset, and in particular, on a site within existing high PTAL levels and excellent accessibility. As LBI's ten-year housing target is 7,750 homes, the development equates to 1.27 years' worth of housing supply.</p>
<b>H2</b>	<b>Small Sites</b>	This Policy is not relevant to the proposed development.	
<b>H3</b>	<b>Meanwhile use as Housing</b>	This Policy is not relevant to the proposed development.	
<b>H4</b>	<b>Affordable Housing</b>	<p>A) The strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include:</p>	<p>The Site comprises public sector land and is therefore required to deliver at least 50%t affordable housing on site.</p>

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		<p>1) requiring major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach (Policy H5 Threshold approach to applications)</p> <p>2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided</p> <p>3) all affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their development programme, and 60 per cent in the case of strategic partners</p> <p>4) public sector land delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio</p> <p>5) industrial land appropriate for residential use in accordance with Policy E7 Industrial intensification, co-location and substitution, delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity</p> <p>B) Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.</p>	<p>The development provides 60% affordable housing (by unit). The first 50% is provided without grant. The Applicant has sought to maximise affordable housing beyond the minimum required amount of 50% and provides the additional 10% affordable housing utilising grant. This results in a total offer of 60% affordable housing.</p> <p>The development is therefore in accordance with Policy H4, and therefore contributes towards meeting the London-wide strategic target for affordable housing and proposes 60% affordable housing.</p>
<b>H5</b>	<b>Threshold Approach to Applications</b>	<p>A) The threshold approach applies to major development proposals which trigger affordable housing requirements.</p> <p>1) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity.</p> <p>B) The threshold level of affordable housing on gross residential development is initially set at:</p> <p>1) a minimum of 35 per cent; or</p> <p>2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or</p> <p>3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity</p> <p>C) To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:</p> <p>1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy</p> <p>2) be consistent with the relevant tenure split</p>	<p>The Site has a threshold level of affordable housing of 50% as it comprises public sector land.</p> <p>The development exceeds this threshold level by providing 60% affordable housing on site. The development therefore meets the requirement to follow the Fast Track Route as follows:</p> <p>1) The development exceeds the relevant threshold level of affordable housing on site by providing 60% affordable housing</p> <p>2) The development is consistent with the relevant tenure split as required by Policy H6 by providing 70% low-cost rented homes as Social Rent homes and 30% intermediate homes as London Shared Ownership homes</p> <p>3) As demonstrated in the Planning Statement, the development meets the other relevant policy requirements and obligations</p> <p>4) The development exceeds the strategic 50% target by providing 60% affordable housing.</p>

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		<p>3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant</p> <p>4) demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.</p> <p>D) Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant.</p> <p>E) Fast tracked applications are not required to provide a viability assessment at application stage. To ensure an applicant fully intends to build out the permission, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough).</p> <p>F) Where an application does not meet the requirements set out in Part C it must follow the Viability Tested Route. This requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application:</p> <p>1) the borough, and where relevant the Mayor, should scrutinise the viability information to ascertain the maximum level of affordable housing using the methodology and assumptions set out in this Plan and the Affordable Housing and Viability SPG</p> <p>2) viability tested schemes will be subject to:</p> <p>a) an Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough)</p> <p>b) a Late Stage Viability Review which is triggered when 75 per cent of the units in a scheme are sold or let (or a period agreed by the borough)</p> <p>c) Mid Term Reviews prior to implementation of phases for larger phased schemes.</p> <p>G) Where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and undertaken in line with the Mayor's Affordable Housing and Viability SPG.</p> <p>H)</p> <p>I)</p>	
<b>H6</b>	<b>Affordable Housing Tenure</b>	<p>A) The following split of affordable products should be applied to residential development:</p> <p>1) a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes</p>	<p>Parts H – I of the policy apply to amendment applications and are therefore not relevant to the proposed development.</p> <p>The development proposes 60% affordable housing at a tenure split of:</p> <ul style="list-style-type: none"> <li>• 70% low-cost rented homes (social rent at Target Rent levels); and</li> </ul>

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		<p>2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership</p> <p>3) the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.</p> <p>B) To follow the Fast Track Route the tenure of 35 per cent of homes must meet the requirements set out in Part A. The Fast Track Route is also available to applicants that elect to provide low-cost rented homes in place of intermediate homes, provided the relevant threshold level is reached. Where affordable homes are provided above 35 per cent, their tenure is flexible, provided the homes are genuinely affordable (defined in Part A1 and Part A2), and should take into account the need to maximise affordable housing provision, along with any preference of applicants to propose a particular tenure.</p>	<ul style="list-style-type: none"> <li>30% intermediate homes (London Shared Ownership)</li> </ul> <p>This is in accordance with the policy split set out in Policy H6 and the development therefore qualifies for the Fast Track Approach to Viability.</p>
H7	Monitoring of Affordable Housing	This Policy is not relevant to the Proposed development.	
H8	Loss of existing housing and estate redevelopment	This Policy is not relevant to the Proposed development.	
H9	Ensuring the Best Use of Stock	This Policy is not relevant to the Proposed development.	
H10	Housing Size Mix	<p>A) Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:</p> <ol style="list-style-type: none"> <li>robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment</li> <li>the requirement to deliver mixed and inclusive neighbourhoods</li> <li>the need to deliver a range of unit types at different price points across London</li> <li>the mix of uses in the scheme</li> <li>the range of tenures in the scheme</li> </ol>	<p>The housing mix of the proposed development, as set out in the accommodation schedule which accompanies the planning application, has sought to provide a mix that responds to LBI Draft Local Plan Table 3.2 which is based on the latest housing need evidence. the development also responds to advice from LBI's Housing Team regarding the social rent mix that the greater need is for 2 and 3 bedroom social rent accommodation.</p>

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		<p>6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity</p> <p>7) the aim to optimise housing potential on sites</p> <p>8) the ability of new development to reduce pressure on conversion, subdivision and amalgamation of existing stock</p> <p>9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing.</p> <p>B) For low-cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of:</p> <ol style="list-style-type: none"> <li>1) evidence of local housing needs, including the local housing register and the numbers and types of overcrowded and under-occupying households</li> <li>2) other criteria set out in Part A, including the strategic and local requirement for affordable family accommodation</li> <li>3) the impact of welfare reform</li> <li>4) the cost of delivering larger units and the availability of grant.</li> </ol>	<p>The social rent provision of 415 units includes 60 Extra Care social rent 1-bedroom homes which meet a specific need, in accordance with Draft Local Plan Policy H7.</p> <p>The development provides a mix of 1 to 4 bedroom units, including 696 family homes (2+ bedroom as defined in supporting text to Draft Local Plan H2).</p> <p>The mix is considered to provide an appropriate mix of units taking into account housing need, the characterises of the development and the proposed tenures, in accordance accord with London Plan Policy H10, Core Strategy Policy CS12, Development Management Policies DPD Policy DM3.1, and Draft Local Plan H2.</p> <p>As above, the proposed housing mix has had regards to LBI Draft Local Plan Table 3.2 which is based on the latest housing need evidence and advice from LBI's Housing Team.</p>
<b>H11</b>	<b>Building to Rent</b>	This Policy is not relevant to the Proposed development.	
<b>H12</b>	<b>Supported and Specialised Accommodation</b>	This Policy is not relevant to the Proposed development.	
<b>H13</b>	<b>Specialist Older Persons Housing</b>	<p>A) Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of:</p> <ol style="list-style-type: none"> <li>1) local housing needs information including data on the local type and tenure of demand, and the indicative benchmarks set out in Table 4.3</li> <li>2) the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport</li> </ol>	The proposals include the provision of 60 self-contained Extra Care Units. These are included within Block E1.



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		<p>3) the increasing need for accommodation suitable for people with dementia.</p> <p>B) Specialist older persons housing provision should deliver:</p> <ol style="list-style-type: none"> <li>1) affordable housing in accordance with Policy H4 Delivering affordable housing, and Policy H5 Threshold approach to applications</li> <li>2) accessible housing in accordance with Policy D7 Accessible housing</li> <li>3) the highest standards of accessible and inclusive design in accordance with Policy D5 Inclusive design</li> <li>4) suitable levels of safe storage and charging facilities for residents' mobility scooters</li> <li>5) pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs), minibuses and ambulances.</li> </ol>	<p>The proposed Extra Care Units are in accordance with the following principles:</p> <ul style="list-style-type: none"> <li>• It is proposed that all of the Extra Care Units would be social rent. This would form part of the overall affordable housing offer for the scheme and satisfies Policies H4 and H5;</li> <li>• Policy D7 seeks 10% M4(3) homes and 90% M4(2). All of the Extra Care units are designed as M4(3) homes, exceeding the policy requirement. This provision contributes to the 12% site wide provision of M4(3) homes.</li> <li>• Policy D5 Part B sets five criteria that proposals should achieve: <ul style="list-style-type: none"> <li>○ The proposal has been designed to take into account London's diverse population. The Extra Care Units form part of a wider scheme and contribute to a mixed and balanced community.</li> <li>○ The proposal provides high quality people focused spaces that are designed to facilitate social interaction and inclusion. Communal facilities are provided within the building for all residents of the Extra Care Units to use.</li> <li>○ The Extra Care Units are provided with their own entrance which lies adjacent to the internal road and opposite the public park. This is convenient and welcoming.</li> <li>○ The proposal is design to be entered, used and exited safely, easily and with dignity for all. Two lifts are provided.</li> <li>○ The proposal has been designed to incorporate safe and dignified emergency evacuation for all building users. Two lifts are proposed.</li> </ul> </li> <li>• Safe storage and charging facilities for residents' mobility scooters is provided at ground level. All spaces have charging facilities.</li> </ul>

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			<ul style="list-style-type: none"> <li>The site includes the provision of accessible parking bays at a ratio 3% of the residential dwellings. The scheme also provides servicing bays and the Transport Assessment, prepared by Velocity, sets out that this could also be used for drop-off and pick up activity. There are accessible parking bays and a loading bay along the internal road adjacent to Plot E.</li> <li>The proposed Extra Care Units are therefore compliant with Policy H13 Part B.</li> </ul>
H14	<b>Gypsy and traveller accommodation</b>	This Policy is not relevant to the Proposed development.	
H15	<b>Purpose-built student accommodation</b>	This Policy is not relevant to the Proposed development.	
H16	<b>Large-scale purpose-built shared living</b>	This Policy is not relevant to the Proposed development.	
<b>Chapter 5 – Social Infrastructure</b>			
S1	<b>Developing London's Social Infrastructure</b>	A) When preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community	The Site comprises the Former Holloway Prison. In Autumn 2015, the then Lord Chancellor and Secretary of State for Justice announced that Holloway Prison would be closed and sold, with the funds from the sale contributing towards improvements to other prisons across within the wider Ministry of Justice national estate. From May 2016, all prisoners were moved to HMP Downview and HMP Bronzefield, both in Surrey. In July 2016 Holloway Prison was closed. LBI identified the site for residential-led redevelopment, and prepared and adopted the Holloway Prison Site SPD in January 2018 which provides further guidance on the approach for development of the site. A key objective of the Holloway Prison SPD is for any future redevelopment of the Site to include provision of a Women's Building that incorporates safe space to support women in
		B) In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans	
		C) Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.	
		D) Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.	

Policy	Policy Title	London Plan (2021) Policy	Assessment
		<p>E) New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres</p> <p>F) Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under Part A should only be permitted where:</p> <ol style="list-style-type: none"> <li>1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or;</li> <li>2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services</li> </ol> <p>G) Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan</p>	<p>the criminal justice system. The scheme provides a Women's Building in accordance with this objective.</p>
S2	<b>Health and Social Care Facilities</b>	This policy is not relevant to the Proposed development.	
S3	<b>Education and Childcare Facilities</b>	This policy is not relevant to the Proposed development.	
S4	<b>Play and Informal Recreation</b>	<p>A) Development proposals for schemes that are likely to be used by children and young people should:</p> <ol style="list-style-type: none"> <li>1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile</li> <li>2) for residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that: <ol style="list-style-type: none"> <li>a) provides a stimulating environment</li> <li>b) can be accessed safely from the street by children and young people independently</li> <li>c) forms an integral part of the surrounding neighbourhood</li> <li>d) incorporates trees and/or other forms of greenery</li> <li>e) is overlooked to enable passive surveillance</li> <li>f) is not segregated by tenure</li> </ol> </li> <li>3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently</li> <li>4) for large-scale public realm developments, incorporate incidental play space to make the space more playable</li> </ol>	<p>This part of the policy applies to local authorities and is therefore not relevant to the development.</p> <ol style="list-style-type: none"> <li>1) Play is a fundamental part of the proposals, encouraging the creation of a happy and cohesive community where children are welcomed into the urban environment and promoting health and well-being. The landscaping strategy proposes a child-friendly public realm by integrating imaginative play as part of the overall design and ensuring there are a range of play options across the development.</li> <li>2) The development includes 5,292sqm of play space. This quantum is based on 10sqm per child and the number of children and age split calculated with the GLA's Population Yield calculator based on the scheme mix and tenure of the residential units. This excludes the 60 Extra Care homes as these homes will be subject to an occupancy age restriction and will therefore not generate child occupants. A copy of the child yield</li> </ol>

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		<p>5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand. Where published, a borough's play and informal recreation strategy should be used to identify ongoing or future demand for play provision.</p>	<p>calculator is included within the Open Space Assessment prepared by Exterior Architecture which accompanies this planning application. The play space:</p> <ul style="list-style-type: none"> <li>a. Provides a stimulating environment with a wide range of play opportunities for different age groups</li> <li>b. Is located so that it can be accessed by children and young people independently and the scheme utilises safe and enclosed communal gardens for provision of additional play opportunities. 100% of the play space is provided at ground and first floor level. There is no play provision proposed at roof level.</li> <li>c. The play space is integral to the proposed development and surrounding neighbourhood. This includes a large, public 'destination' play area at the heart of the site for all ages and abilities which will be publicly accessible.</li> <li>d. The play strategy is integrated into the overall landscaping scheme which utilises existing trees and proposes a significant number of new trees and other forms of greenery.</li> <li>e. The play provision has been designed and located to enable passive surveillance. The scheme includes space for teenagers and young adults which are activated, sufficiently lit and well overlooked.</li> <li>f. The play provision is not segregated by tenure.</li> </ul> <p>3) The development seeks to improve accessibility and movement both through the Site and to the surrounding area.</p> <p>4) The development seeks to incorporate incidental play space within the public realm. the development includes play pockets throughout the public realm which will be natural and integrated into the surface treatment. There will also be a natural play trial with interlinked play obstacles in a natural setting.</p> <p>5) The proposed development does not result in the net loss of play provision.</p>

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S5	<b>Sports and Recreation Facilities</b>	This Policy relates to existing and proposed sports and recreation facilities and is therefore not relevant to the development.	
S6	<b>Public Toilets</b>	<p>A) Large-scale developments that are open to the public, and large areas of public realm, should provide and secure the future management of:</p> <p>1) free publicly-accessible toilets suitable for a range of users including disabled people, families with young children and people of all gender identities; and</p> <p>2) free 'Changing Places' toilets designed in accordance with the guidance in British Standard BS8300-2:2018.</p> <p>These should be available during opening hours, or 24 hours a day where accessed from areas of public realm.</p>	Public toilets were not identified as requirement during the course of pre-application discussions and are therefore not included within the development.
S7	<b>Burial Space</b>	This Policy is not relevant to the Proposed development.	
<b>Chapter 6 - Economy</b>			
E1	<b>Offices</b>	A) Improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.	The development includes the provision of 1,822sqm Class E floorspace to be provided across to Plot B and C. This could come forward for occupation as offices.
		B)	Part B to I of this policy is not relevant to the development.
		C)	
		D)	
		E)	
		F)	
		G)	
		H)	
I)			
E2	<b>Providing Suitable Business Space</b>	A)	Part A is a requirement for local authorities.
		B) Development of B Use Class business uses should ensure that the space is fit for purpose having regard to the type and use of the space.	The development includes the provision of 1,822sqm Class E floorspace to be provided across to Pot B and C. This allows for full flexibility to allow for a range of uses.
		C)	
		D)	

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			<p>significant benefits for the local community including the regeneration benefits of the re-use of a large, prominent and under-used site; significant local employment opportunities firstly, in its construction and subsequently, in the delivery of community and retail floorspace; and important social benefits from the new community facilities proposed.</p> <p>Part C and D of the Policy are not relevant to the development.</p>
<b>E3</b>	<b>Affordable Workspace</b>	This Policy is not relevant to the Proposed development.	
<b>E4</b>	<b>Land for industry, logistics and services to support London's economic function</b>	This Policy is not relevant to the Proposed development.	
<b>E5</b>	<b>SIL</b>	This Policy is not relevant to the Proposed development.	
<b>E6</b>	<b>Locally Significant Industrial Sites</b>	This Policy is not relevant to the Proposed development.	
<b>E7</b>	<b>Industrial intensification, co-location and substitution</b>	This Policy is not relevant to the Proposed development.	
<b>E8</b>	<b>Sector growth opportunities and clusters</b>	This Policy is not relevant to the Proposed development.	
<b>E9</b>	<b>Retail, Markets and Hot Food Takeaways</b>	A) A successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres (Policy SD6 Town centres and high streets, Policy SD8 Town centre network, Policy SD7 Town centres:	The development will provide 1,822sqm of flexible commercial floorspace (Use Class E) within Plot B and C which could come forward for occupation as retail. As the Site is not located within a town centre, this planning

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		development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation).	<p>application is accompanied by a Main Town Centre Uses Impact Assessment prepared by WSP. The scope of this assessment was agreed with LBI during pre-application discussions.</p> <p>Part B relates to the role of Local Authorities and is therefore not relevant to the proposed development.</p> <p>Part D to F are not relevant to the development.</p>
		B)	
		<p>C) Development Plans and development proposals should:</p> <ol style="list-style-type: none"> <li>1) bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres</li> <li>2) support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel</li> <li>3) provide a policy framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping</li> <li>4) identify areas under-served in local convenience shopping and related services and support additional facilities to serve existing or new residential communities in line with town centre Policy SD7 Town centres: development principles and Development Plan Documents</li> <li>5) support London's markets in their full variety, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to local identity and the vitality of town centres and the Central Activities Zone</li> <li>6) manage existing edge-of-centre and out-of-centre retail (and leisure) by encouraging comprehensive redevelopment for a diverse mix of uses in line with Policy SD6 Town centres and high streets, Policy Policy SD8 Town centre network, Policy SD7 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation to realise their full potential for housing intensification, reducing car use and dependency, and improving access by walking, cycling and public transport</li> <li>7) manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including:               <ol style="list-style-type: none"> <li>a) town centre vitality, viability and diversity</li> <li>b) sustainability and accessibility</li> <li>c) place-making or local identity</li> <li>d) community safety or security</li> <li>e) mental and physical health and wellbeing.</li> </ol> </li> </ol>	
		D)	
		E)	

Policy	Policy Title	London Plan (2021) Policy	Assessment
		F)	
<b>E10</b>	<b>Visitor Infrastructure</b>	This Policy is not relevant to the Proposed development.	
<b>E11</b>	<b>Skills and Opportunities for all</b>	<p>A) The Mayor will work with strategic partners to address low pay and gender and ethnicity pay gaps, and, as set out in his Skills for Londoners Strategy, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.</p> <p>B) Development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Boroughs should ensure these are implemented in ways that:</p> <ol style="list-style-type: none"> <li>1) enable those people undertaking training to complete their training and apprenticeships</li> <li>2) ensure the greatest possible level of take-up by Londoners of the training, apprenticeship and employment opportunities created</li> <li>3) increase the proportion of under-represented groups within the construction industry workforce.</li> </ol> <p>In partnership with the Mayor, boroughs are encouraged to consider cross borough working to open up opportunities, including those created via Section 106 obligations, on a reciprocal basis, to residents from adjacent boroughs and across London.</p>	The development will support employment, skills development, apprenticeship and other education and training opportunities in both the construction and end-use phases. This will be secured in the s106 legal agreement as appropriate.
<b>Chapter 7 - Heritage and Culture</b>			
<b>HC1</b>	<b>Heritage Conservation and Growth</b>	<p>A) Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area</p> <p>B) Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:</p> <ol style="list-style-type: none"> <li>1) setting out a clear vision that recognises and embeds the role of heritage in place-making</li> <li>2) utilising the heritage significance of a site or area in the planning and design process</li> </ol>	<p>There are no designated archaeological heritage assets such as Scheduled Monuments within 0.5km of the Site. The nearest Scheduled Monument to the Site is located more than 2.5km from the Site.</p> <p>There are no statutorily listed buildings or locally listed buildings within the Site. There are four listed buildings within 250m of the Site including the Grade II Listed St Luke's Church, Verger's Cottage, former Baptist Church and no. 23 Carleton Road. There are also a number of locally listed buildings in the vicinity of the Site.</p> <p>The Site does not lie within a Conservation Area, however, is within 20m of Hillmarton Conservation Area (which lies to the south, south-west, east and north-east of the Site) and</p>



Policy	Policy Title	London Plan (2021) Policy	Assessment
		<p>3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place</p> <p>4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.</p> <p>C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.</p> <p>D) Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.</p> <p>E) Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and reuse.</p>	<p>within 50m of Tufnell Park Conservation Area (which lies to the west and north-west of the Site). The Hillmarton Conservation Area is characterised by two and three storey Victorian semi-detached and terraced houses and the Tufnell Park Conservation Area is characterised by Edwardian and Victorian three storey housing.</p> <p>The Site is not within a designated Archaeological Priority Area (APA) as defined by the LBI. Notwithstanding this, the application is accompanied by a Historic Environment Assessment prepared by Mola. This confirms that the development is unlikely to have a significant effect on heritage assets of archaeological interest.</p> <p>The planning application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment which considers the impact of the development on heritage assets.</p>
<b>HC2</b>	<b>World Heritage Sites</b>	This Policy is not relevant to the Proposed development.	
<b>HC3</b>	<b>Strategic and Local Views</b>	<p>A) Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. The Mayor has designated a list of Strategic Views (Table 7.1) that he will keep under review. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.</p> <p>B) Within the designated views, the Mayor will identify landmarks that make aesthetic, historic, cultural or other contributions to the view and which assist the viewer's understanding and enjoyment of the view.</p> <p>C) The Mayor will also identify Strategically-Important Landmarks in the views that make a very significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. He will seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and</p>	<p>The Site does lie within the viewing corridor of two LBI protected views:</p> <ul style="list-style-type: none"> <li>• Local View 4, Archway Road to St Paul's Cathedral</li> <li>• Local View 5, Archway Bridge to St Paul's Cathedral</li> </ul> <p>The planning application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment which fully assesses the impact of the development on the local views and other views. The scope of this Assessment was agreed with LBI at pre-application stage.</p>

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		<p>wider setting consultation areas. These elements together form a Protected Vista. Each element of the vista will require a level of management appropriate to its potential impact on the viewer's ability to recognise and appreciate the Strategically-Important Landmark. These and other views are also subject to wider assessment beyond the Protected Vista.</p> <p>D) The Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity, and attributes of Outstanding Universal Value. This includes the identification of Protected Silhouettes of key features in a World Heritage Site.</p> <p>E) The Mayor has prepared Supplementary Planning Guidance on the management of the designated views – the London View Management Framework Supplementary Planning Guidance (LVMF SPG). The Mayor will, when necessary, review this guidance.</p> <p>F) Boroughs should include all designated views, including the protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle ground and background are effectively managed in accordance with the LVMF SPG.</p> <p>G) Boroughs should clearly identify local views in their Local Plans and strategies. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.</p>	
<b>HC4</b>	<b>London View Management Framework</b>	The Site is not located within the Protected Vista of a designated London View Management Framework and therefore this policy is not relevant.	
<b>HC5</b>	<b>Supporting London's culture and creative industries</b>	<p>A) The continued growth and evolution of London's diverse cultural facilities and creative industries is supported. Development Plans and development proposals should:</p> <ol style="list-style-type: none"> <li>1) protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres and places with good public transport connectivity. To support this, boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, evaluate what is unique or important to residents, workers and visitors and develop policies to protect those cultural assets and community spaces</li> <li>2) identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal</li> </ol>	<p>The existing Site does not comprise an existing cultural venue and the Site is located within a defined Creative Enterprise Zone.</p> <p>Notwithstanding this, in June 2021 Peabody commissioned a specialist study into the legacy of the Site designed to capture both the physical remains and the story of the former prison, and to then memorialise its legacy within the Women's Building, garden of the Women's Building and the wider public realm. Further detail is included in the accompanying Statement of Community Involvement and Design and Access Statement.</p>

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		3) identify, protect and enhance strategic clusters of cultural attractions 4) consider the use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres, Cultural Quarters and other areas 5) seek to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues and/or facilities and spaces for outdoor cultural events. B) C)	Part B and C of this Policy are not relevant to the development.
<b>HC6</b>	<b>Supporting the night-time economy</b>	This Policy is not relevant to the development.	
<b>HC7</b>	<b>Protecting Public Houses</b>	This Policy is not relevant to the development.	
<b>Chapter 8 - Green Infrastructure and Natural Environment</b>			
<b>G1</b>	<b>Green Infrastructure</b>	A) London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits. B) Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A. C) Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to: 1) identify key green infrastructure assets, their function and their potential function 2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions. D) Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.	The development includes extensive green infrastructure through green space, green roofs and additional planting. Landscaping has been central to the proposed design and the development of a landscape-led masterplan. The approach has been based on connecting to the wider landscape, reducing cars and prioritising people, creating a place for people and using ecology to define spatial types. The key site-based strategies have been to retain the green heart of the site, connect the site to its surroundings and transform a once inward-facing and closed off space into an opening and welcoming space. The development has sought to encourage, explore and maximise opportunities to create new public realm. Further detail is included in the Open Space and Recreation Assessment and Landscape Design Strategy prepared by Exterior Architecture.
<b>G2</b>	<b>London's Green Belt</b>	This Policy is not relevant to the Proposed development.	
<b>G3</b>	<b>MOL</b>	This Policy is not relevant to the Proposed development.	

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<b>G4</b>	<b>Open Space</b>	A)	This part of the policy relates to Development Plans and is therefore not relevant to the development.
		B) Development proposals should: 1) not result in the loss of protected open space 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency	The development does not result in the loss of protected open space. Rather, the development incorporates a significant amount of new publicly accessible open space. This includes a large public garden at the heart of the proposals.
<b>G5</b>	<b>Urban Greening</b>	A) Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.	The potential for the scheme to accommodate urban greening and overall green cover has been maximised. The urban greening factor for the scheme has been calculated and results in a score in excess of the policy requirement of 0.4.  Where possible, existing green cover has been retained on site and integrated with new greening features.
		B) Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).	
		C) Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.	
<b>G6</b>	<b>Biodiversity and Access to Nature</b>	A) Sites of Importance for Nature Conservation (SINCs) should be protected.	The Site is not designated (statutorily or non-statutorily) for any nature conservation value.  The planning application is accompanied by an Ecology Assessment included within the Environmental Statement in order to ensure that the proposals manage impacts on biodiversity. The Ecological Assessment includes a series of recommendations in order to enhance and protect the ecological value of the Site. These recommendations have been incorporated into the proposed landscaping scheme and overall design. A net gain in biodiversity is secured.  Part B and C of the Policy are either for the Local Authority or not relevant to the development.
		B)	
		C)	
		D) Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.	
		E) Proposals which reduce deficiencies in access to nature should be considered positively.	
<b>G7</b>	<b>Trees and Woodlands</b>	A) London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.	Due to the strategic nature of this part of Policy G7, its relevance is limited. New tree planting is proposed as part of the development.
		B)	This part applies to local authorities and is therefore not relevant.

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		<p>C) Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy</p>	<p>The Site at present includes a number of trees ranging from semi-mature to mature, with a wide range of sizes. These have been surveyed as part of the planning application and the results of which are included within the Arboricultural Impact Assessment prepared by Barton Hyett. None of the existing trees are subject of a TPO.</p> <p>The site layout has been designed with the aim of retaining as many of the most visually-significant and high quality trees as possible. The proposed development seeks the removal of 44 individual trees, 10 groups of trees and 3 hedges. None of the trees proposed to be removed are Category A trees (i.e., the highest quality of trees). Furthermore, the proposed landscaping scheme for the site will deliver a substantial net gain in the number of trees and canopy cover for the site. This includes the planting of 364 new trees.</p>
G8	Food Growing	<p>A) In Development Plans, boroughs should:</p> <ol style="list-style-type: none"> <li>1) protect existing allotments and encourage provision of space for urban agriculture, including community gardening, and food growing within new developments and as a meanwhile use on vacant or under-utilised sites</li> <li>2) identify potential sites that could be used for food production.</li> </ol>	<p>The landscaping proposals for the development include opportunity for food growing within the nature garden.</p>
G9	Geodiversity	<p>This policy is not relevant to the development proposals.</p>	
<p><b>Chapter 9 – Sustainable Infrastructure</b></p>			
SI1	Improving Air Quality	<p>A)</p> <p>B) To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:</p> <ol style="list-style-type: none"> <li>1) Development proposals should not:                             <ol style="list-style-type: none"> <li>a) lead to further deterioration of existing poor air quality</li> <li>b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits</li> <li>c) create unacceptable risk of high levels of exposure to poor air quality</li> </ol> </li> <li>2) In order to meet the requirements in Part 1, as a minimum:                             <ol style="list-style-type: none"> <li>a) development proposals must be at least Air Quality Neutral</li> <li>b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local</li> </ol> </li> </ol>	<p>Part A is relates to the role of Local Authorities and is therefore not relevant to the proposed development.</p> <p>The development is inherently sustainable and will not deteriorate existing air quality levels, further, the proposals provide solutions to prevent exposure to existing air pollution. The application has been accompanied by an Air Quality Assessment within the Environmental Statement.</p>

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		<p>problems of air quality in preference to post-design or retro-fitted mitigation measures</p> <p>c) major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1</p> <p>d) development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.</p> <p>C) Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:</p> <ol style="list-style-type: none"> <li>1) how proposals have considered ways to maximise benefits to local air quality, and</li> <li>2) what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.</li> </ol> <p>D) In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.</p> <p>E) Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.</p>	
S12	<b>Minimising Greenhouse Gas Emissions</b>	<p>A) Major development should be net zero-carbon.</p> <p>This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:</p> <ol style="list-style-type: none"> <li>1) be lean: use less energy and manage demand during operation</li> <li>2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly</li> <li>3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site</li> <li>4) be seen: monitor, verify and report on energy performance.</li> </ol>	The development follows the London Plan energy hierarchy and the submitted Energy Statement demonstrates how the development aims to achieve zero-carbon targets, with a minimum on-site reduction of at least 35% beyond building regulations.

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		<p>B) Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.</p> <p>C) A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:</p> <ol style="list-style-type: none"> <li>1) through a cash in lieu contribution to the borough's carbon offset fund, or</li> <li>2) off-site provided that an alternative proposal is identified, and delivery is certain.</li> </ol> <p>D) Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.</p> <p>E) Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.</p> <p>F) Development proposals referable to the Mayor should calculate whole lifecycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.</p>	
<b>SI3</b>	<b>Energy Infrastructure</b>	<p>A)</p> <p>B)</p> <p>C)</p> <p>D) Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system:</p> <ol style="list-style-type: none"> <li>1) the heat source for the communal heating system should be selected in accordance with the following heating hierarchy: <ol style="list-style-type: none"> <li>a) connect to local existing or planned heat networks</li> <li>b) use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)</li> <li>c) use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network)</li> <li>d) use ultra-low NOx gas boilers</li> </ol> </li> </ol>	<p>Part A-C of the policy is not relevant to the proposed development.</p> <p>There are no existing or planned networks within 500m of the Site and therefore Step 1 in the hierarchy is not possible. The proposed energy strategy for the scheme comprises Air Source Heat Pumps and the roof space has been utilised in order to maximise the number of photovoltaic panels that can be accommodated.</p>

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		2) CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they meet the requirements in Part B of Policy SI 1 Improving air quality 3) where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date. E) Heat networks should achieve good practice design and specification standards for primary, secondary and tertiary systems comparable to those set out in the CIBSE/ADE Code of Practice CP1 or equivalent.	
<b>SI4</b>	<b>Managing Heat Risk</b>	A) Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. B) Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy: <ol style="list-style-type: none"> <li>1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure</li> <li>2) minimise internal heat generation through energy efficient design</li> <li>3) manage the heat within the building through exposed internal thermal mass and high ceilings</li> <li>4) provide passive ventilation</li> <li>5) provide mechanical ventilation</li> <li>6) provide active cooling systems.</li> </ol>	The development has been designed to reduce urban heat island impacts through design, layout, orientation, material and green infrastructure. Internal overheating and a reduced reliance upon air conditioning systems is detailed in the submitted Sustainable Design and Construction Statement.
<b>SI5</b>	<b>Water Infrastructure</b>	A) In order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner. B) C) Development proposals should: <ol style="list-style-type: none"> <li>1) through the use of Planning Conditions minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)</li> <li>2) achieve at least the BREEAM excellent standard for the 'Wat 01' water category 160 or equivalent (commercial development)</li> <li>3) incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing.</li> </ol> D)	The development achieves water consumption levels in of 105 litres or less per head per day and will achieve the required BREEAM, and water measures required by criterion C.2 and C.3. the development will not lead to harm to the water environment, and suitable foul and surface water networks are created.  Part B, D and F of this Policy are not relevant to the development.



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		E) Development proposals should: <ol style="list-style-type: none"> <li>1) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided</li> <li>2) take action to minimise the potential for misconnections between foul and surface water networks.</li> </ol> F)	
<b>SI6</b>	<b>Digital Connectivity Infrastructure</b>	A) To ensure London's global competitiveness now and in the future, development proposals should: <ol style="list-style-type: none"> <li>1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users</li> <li>2) meet expected demand for mobile connectivity generated by the development</li> <li>3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation</li> <li>4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.</li> </ol> B) Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.	All residential and non-residential units will be served by full-fibre internet connections.
<b>SI7</b>	<b>Reducing waste and supporting the circular economy</b>	A) Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to: <ol style="list-style-type: none"> <li>1) promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible</li> <li>2) encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products</li> <li>3) ensure that there is zero biodegradable or recyclable waste to landfill by 2026</li> <li>4) meet or exceed the municipal waste recycling target of 65 per cent by 2030</li> <li>5) meet or exceed the targets for each of the following waste and material streams:                             <ol style="list-style-type: none"> <li>a) construction and demolition – 95 per cent reuse/recycling/recovery</li> <li>b) excavation – 95 per cent beneficial use</li> </ol> </li> <li>6) design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.</li> </ol>	The development has been designed in accordance with the principles of the Circular Economy in order to contribute towards meeting the objectives in Part A of Policy SI7. This includes contributing to targets for waste as the development seeks to recycle 95% of waste generated.

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		<p>B) Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:</p> <ol style="list-style-type: none"> <li>1) how all materials arising from demolition and remediation works will be re-used and/or recycled</li> <li>2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life</li> <li>3) opportunities for managing as much waste as possible on site</li> <li>4) adequate and easily accessible storage space and collection systems to support recycling and re-use</li> <li>5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy</li> <li>6) how performance will be monitored and reported.</li> </ol>	<p>The development is accompanied by a Circular Economy Statement. This sets out the following:</p> <ol style="list-style-type: none"> <li>1. Details of how all materials arising from demolition and remediation works will be re-used and/or recycled. Waste management during both the demolition and construction periods will be undertaken in accordance with the Site Waste Management Plan, including that all relevant contractors will be required to investigate opportunities to minimise and reduce waste generation.</li> <li>2. Consideration of how the proposal's design and construction will reduce material demands and enable building materials to be re-used at the end of their useful life.</li> <li>3. A Waste Management Plan, prepared by WSP, is submitted with the planning application and takes into account the need to lessen the overall impact of waste generation.</li> <li>4. Sufficient storage space for the segregation and storage of waste streams in both individual units and communal bin stores will be provided to enable effective waste segregation and promote higher recycling rates.</li> <li>5. The quantum of waste expected to be generated and how this will be managed.</li> <li>6. How the performance of the development will be monitored and reported on an ongoing basis.</li> </ol>
		C)	This part of the Policy is not relevant to the development.
<b>S18</b>	<b>Waste capacity and net waste self-sufficiency</b>	This policy is not relevant to the development proposals.	
<b>S19</b>	<b>Safeguarded Waste Sites</b>	This policy is not relevant to the development proposals.	
<b>S110</b>	<b>Aggregates</b>	This policy is not relevant to the development proposals.	

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SI11	Hydraulic fracturing (Fracking)	This policy is not relevant to the development proposals.	
SI12	Flood Risk Management	A)	Due to the strategic nature of this part of the policy, its relevance is limited.
		B)	Part B of Policy SI12 relates to development plans and therefore is not relevant to the proposed development.
		C) Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.	The planning application is accompanied by a Flood Risk Assessment (FRA) prepared by Waterman to ensure that flood risk is minimised and mitigated, and that residual risk is addressed.
		D) Developments Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier.	Due to the location of the proposed development, Part D of Policy SI12 is not relevant.
		E)	Part E of Policy SI12 is not relevant.
		F)	Part F of Policy SI12 is not relevant.
		G) Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.	The proposed development includes a number of sustainable urban drainage systems including permeable paving, underground tanks, rain gardens and green roofs.
SI13	Sustainable Drainage	A)	Part A of Policy SI3 applies to Local Lead Flood Authorities and therefore is not relevant to the Proposed development.
		B) Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy: <ol style="list-style-type: none"> <li>1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)</li> <li>2) rainwater infiltration to ground at or close to source</li> <li>3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)</li> <li>4) rainwater discharge direct to a watercourse (unless not appropriate)</li> <li>5) controlled rainwater discharge to a surface water sewer or drain</li> <li>6) controlled rainwater discharge to a combined sewer.</li> </ol>	The planning application is accompanied by a Flood Risk Assessment (FRA) prepared by Waterman. This confirms that the Site is located in Flood Zone 1 (low risk) and the development will not lead to increased flood risk elsewhere. The development includes significant regrading of land levels and the use of Sustainable Urban Drainage Systems including permeable paving, green roofs and rain gardens which will be fully incorporated into the landscaping design. Further detail are provided in the Open Space and Recreation Assessment and Landscape Design Strategy. The development has followed the drainage hierarchy and runoff from the Site is proposed to be restricted to greenfield rates for all events up to and including the 1 in 100 year rainfall event in line with planning policy.

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		C) Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.	Permeable paving is proposed throughout the development.
		D) Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.	The development includes a number of SuDS features which have multiple benefits. For example, the development incorporates green roofs which can assist in enhancing biodiversity and the urban greening of the Site.
SI 14	<b>Waterways - Strategic Role</b>	The Site is not located near a waterway and therefore this Policy is not relevant to the Proposed development.	
SI 15	<b>Water Transport</b>	The Site is not located near a waterway and therefore this Policy is not relevant to the Proposed development.	
SI 16	<b>Waterways - use and enjoyment</b>	The Site is not located near a waterway and therefore this Policy is not relevant to the Proposed development.	
SI 17	<b>Protecting and Enhancing London's Waterways</b>	The Site is not located near a waterway and therefore this Policy is not relevant to the Proposed development.	
<b>Chapter 10 - Transport</b>			
T1	<b>Strategic Approach to Transport</b>	A) Development Plans should support, and development proposals should facilitate: <ol style="list-style-type: none"> <li>1) the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041</li> <li>2) the proposed transport schemes set out in Table 10.1.</li> </ol>	The Proposed development has been designed to maximise the potential for sustainable travel and minimise the impact upon the local transport network in order to contribute towards meeting the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.
		B) All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.	The Transport Assessment is submitted with this planning application for the Site to ensure that any impacts on London's transport network and supporting infrastructure are assessed and mitigated where necessary.
T2	<b>Healthy Streets</b>	A) Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.	Part B of the Policy is not relevant to the development.
		B)	The Proposed development has been designed in accordance with the Healthy Streets principles, primarily to reduce the reliance on travel by car and encourage the use of sustainable travel modes, by foot, cycle and public
		C) In Opportunity Areas and other growth areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active travel and public transport.	

Policy	Policy Title	London Plan (2021) Policy	Assessment
		<p>Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators.</p> <p>D) Development proposals should:</p> <ol style="list-style-type: none"> <li>1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance</li> <li>2) reduce the dominance of vehicles on London's streets whether stationary or moving</li> <li>3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.</li> </ol>	<p>transport. A qualitative Healthy Streets audit has been undertaken for the proposed public realm design within the Site, in accordance with the TfL guidance. As such, the Proposed development is car-free apart from the provision of limited disabled parking. The Site is highly accessible by non-car modes of travel, including on foot, by cycle and by public transport, and the Site has a PTAL score of 6a ('excellent'). The Proposed development seeks to create an attractive public realm by creating new access points to the Site, car-free routes through the Site, sitting areas, play space and a central garden space as well as potential improvements to the pedestrian crossing on Parkhurst Road / Camden Road.</p>
<b>T3</b>	<b>Transport Capacity, Connectivity and Safeguarding</b>	Given the strategic nature of this Policy, its relevance is limited to the Proposed development.	
<b>T4</b>	<b>Assessing and Mitigating Transport Impacts</b>	<p>A) Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.</p> <p>B) When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.</p> <p>C) Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.</p> <p>D) Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will</p>	<p>This planning application is accompanied by a Healthy Streets Transport Assessment, which considers the impacts of the development on the capacity of the highway network at the local, network-wide and strategic level, considers provisions for contributions to highway improvements and considers the cumulative impact of the development of public transport and the road network. This also confirms that the development proposals do not increase road danger. Moreover, the planning application is also accompanied by a Travel Plan, a Parking Design and Management Plan, a Construction Logistics Plan and a Delivery and Servicing Plan.</p>

Policy	Policy Title	London Plan (2021) Policy	Assessment
		<p>be contingent on the provision of necessary public transport and active travel infrastructure.</p> <p>E) The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.</p> <p>F) Development proposals should not increase road danger.</p>	
<b>T5</b>	<b>Cycling</b>	<p>A) Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:</p> <ol style="list-style-type: none"> <li>1) supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure</li> <li>2) securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3, ensuring that a minimum of two shortstay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.</li> </ol> <p>B) Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.</p> <p>C) Development Plans requiring more generous provision of cycle parking based on local evidence will be supported.</p> <p>D) Where it is not possible to provide suitable short-stay cycle parking off the public highway, the borough should work with stakeholders to identify an appropriate on-street location for the required provision. This may mean the reallocation of space from other uses such as on-street car parking. Alternatively, in town centres, adding the required provision to general town centre cycle parking is also acceptable. In such cases, a commuted sum should be paid to the local authority to secure provision.</p> <p>E) Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently-located, on-street parking facilities such as bicycle hangers.</p> <p>F) Where the use class of a development is not fixed at the point of application, the highest potential applicable cycle parking standard should be applied.</p>	<p>Islington is identified as a borough where higher minimum cycle parking standards apply.</p> <p>The development seeks to connect to the existing and proposed cycle routes within the vicinity of the Site. In addition, the proposed development includes a number of public realm improvements, such as creating new access points to the Site and car-free routes through the Site, which will enhance connectivity, permeability and environment for cyclists.</p> <p>The proposed development will provide cycle parking provision for all uses in line with the standards required in the London Plan and includes provision for larger cycles, including adapted cycles for disabled people. The cycle parking proposed will be designed and laid out in accordance with the London Cycling Design Standards.</p> <p>For the residential element, 80 per cent of cycle parking is two-tier cycle parking whilst 20 per cent is accessible cycle parking for people with non-standard bicycles and those that struggle to use two-tier systems. Of these, 75 per cent will be Sheffield stands and 25 per cent will be Sheffield stands with increased space (i.e. for cargo bikes, hand cranked bikes, trailers, buggies, tandems and tricycles). The accessible cycle parking spaces will be conveniently located to the building entrances. The short stay cycle parking for all uses will be provided within the public realm in the form of Sheffield stands. Further detail of the specification of racks and access will be included within the Transport Assessment which accompanies the planning application.</p>

Policy	Policy Title	London Plan (2021) Policy	Assessment
			The scheme has been designed to comply with the cycle rates set out in Policy T5.
<b>T6</b>	<b>Car Parking</b>	<p>A) Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.</p> <p>B) Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy</p> <p>C) An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.</p> <p>D) The maximum car parking standards set out in Policy T6.1 Residential parking to Policy T6 .5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.</p> <p>E) Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking.</p> <p>F) Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all use classes.</p> <p>G) Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with Policy T6 .1 Residential parking, Policy T6 .2 Office Parking, Policy T6 .3 Retail parking, and Policy T6 .4 Hotel and leisure uses parking. All operational parking should make this provision, including offering rapid charging. New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities.</p> <p>H) Where electric vehicle charging points are provided on-street, physical infrastructure should not negatively affect pedestrian amenity and should ideally be located off the footway. Where charging points are located on the footway, it must remain accessible to all those using it including disabled people.</p> <p>I) Adequate provision should be made for efficient deliveries and servicing and emergency access.</p> <p>J) A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will</p>	<p>Due to the Site's highly accessible location, the proposed development will be car-free apart from a limited number of disabled car parking spaces. The proposal includes 30 disabled parking spaces for Blue Badge holders which will be provided on site, as on-street parking along the internal roads.</p> <p>All of the Blue Badge parking spaces proposed will have active electric vehicle charging capacity. The electric vehicle charging points will be designed so that they do not negatively impact upon pedestrian amenity.</p> <p>The scheme has been designed with adequate provision for deliveries and servicing and emergency access.</p> <p>The planning application is accompanied by a Parking Design and Management Plan which sets out the car parking provision proposed and detail of how this will be designed and managed in line with TfL guidance.</p>



Policy	Policy Title	London Plan (2021) Policy	Assessment
		<p>be designed and managed, with reference to Transport for London guidance on parking management and parking design.</p> <p>K) Boroughs that have adopted or wish to adopt more restrictive general or operational parking policies are supported, including borough-wide or other area-based car-free policies. Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6 .1 Residential parking) must only do so for parts of London that are PTAL 0-1. Inner London boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential use classes in any part of London.</p> <p>L) Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.</p>	
<b>T6.1</b>	<b>Residential Parking</b>	<p>A) New residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with the more restrictive standard applying when a site falls into more than one category.</p> <p>B) Parking spaces within communal car parking facilities (including basements) should be leased rather than sold.</p> <p>C) All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.</p> <p>D) Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking. Any car club spaces should have active charging facilities.</p> <p>E) Large-scale purpose-built shared living, student accommodation and other sui generis residential uses should be car-free.</p> <p>F) The provision of car parking should not be a reason for reducing the level of affordable housing in a proposed development.</p> <p>G) Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:</p>	<p>The development is proposed as car-free with the provision of Blue Badge parking spaces only, in line with the maximum standards in Table 10.3 of the London Plan.</p> <p>All car parking spaces are on street.</p> <p>All car parking spaces proposed will have active charging facilities.</p> <p>The provision of a car club was discussed with TfL during pre-application discussions. TfL confirmed that they do not consider it necessary to provide a car club in this location and therefore no car club is proposed.</p> <p>This part of the Policy is not relevant to the proposed development.</p> <p>The development proposes 60% affordable housing which accords with the tenure split required by planning policy. Moreover, the development is proposed to be car-free with the provision of Blue Badge parking spaces only.</p> <p>In line with Policy, the development is proposed as car-free with the provision of Blue Badge parking spaces only. For 3%</p>



Policy	Policy Title	London Plan (2021) Policy	Assessment
		<ol style="list-style-type: none"> <li>1) ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset</li> <li>2) demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage.</li> </ol>	<p>of the residential units, one Blue Badge parking space per unit will be provided. These will be provided on site, as on-street parking along the internal road.</p> <p>As set out within the Transport Assessment, a Transport Classification of Londoners (TCoL) demographic assessment has been undertaken for the proposed development which suggests the future residents are most likely to comprise 'students and graduates', 'educational advantage' and 'urban mobility', each of which has a 'well below average' or 'below average' car use. Moreover, an assessment of valid Blue Badge permits within the borough has been undertaken, which confirmed that 3.2% of the population had permits within LBI. However, this does not take into consideration the likely demographic of the proposed development. As such, it is considered that the proposed 3% disabled car parking space provision is suitable for the proposed development in this location, given the highly accessible nature of the Site and the likely future demographic. The level of Blue Badge car parking proposed has been agreed with TfL.</p> <p>With respect to additional parking spaces, to provide up to 10% of residential units with a Blue Badge parking space, Peabody has agreed to a financial contribution of £2,000 per space not provided on-site. This accords with LBI's Planning Obligations (Section 106) SPD (2016).</p>
		<p>H) All disabled persons parking bays associated with residential development must:</p> <ol style="list-style-type: none"> <li>1) be for residents' use only (whether M4(2) or M4(3) dwellings)</li> <li>2) not be allocated to specific dwellings, unless provided within the curtilage of the dwelling</li> <li>3) be funded by the payment of a commuted sum by the applicant, if provided on-street (this includes a requirement to fund provision of electric vehicle charging infrastructure)</li> <li>4) count towards the maximum parking provision for the development</li> <li>5) be designed in accordance with the design guidance in BS8300vol.1</li> </ol>	<p>The proposed Blue Badge car parking spaces will meet the following 6 criteria (H):</p> <ul style="list-style-type: none"> <li>• be for residents' use only</li> <li>• not be allocated to specific dwellings</li> <li>• be funded by the payment of a commuted sum by the applicant if provided on-street outside the Site</li> <li>• count towards maximum parking provision</li> <li>• be designed in accordance with the design guidance</li> </ul>

Policy	Policy Title	London Plan (2021) Policy	Assessment
		<p>6) be located to minimise the distance between disabled persons parking bays and the dwelling or the relevant block entrance or lift core, and the route should be preferably level or where this is not possible, should be gently sloping (1:60-1:20) on a suitable firm ground surface.</p>	<ul style="list-style-type: none"> <li>be located to minimise the distance between disabled persons parking bays and the dwelling/block entrance</li> </ul> <p>Confirmation that the proposed Blue Badge parking spaces have been designed in accordance with Part (H) of Policy T6.1 is included within the Parking Design and Management Plan.</p>
<b>T6.2</b>	<b>Office Parking</b>	<p>This Policy is not relevant as the development provides flexible Class E floorspace and no disabled parking is provided for the non-residential elements of the proposed development given the Site is highly accessible by non-car modes of travel, including on foot, by cycle and by public transport and has a PTAL score of 6a ('excellent'). In addition, the Transport Assessment demonstrates the majority of trips generated by the commercial uses are expected to be undertaken by walking and public transport.</p>	
<b>T6.3</b>	<b>Retail Parking</b>	<p>A) The maximum parking standards set out in Table 10.5 should be applied to new retail development, unless alternative standards have been implemented in a Development Plan through the application of Policy G below. New retail development should avoid being car-dependent and should follow a town centre first approach, as set out in Policy SD7 Town centres: development principles and Development Plan Documents.</p> <p>B) To make the most efficient use of land, the starting point for assessing the need for parking provision at all new retail development should be the use of existing public provision, such as town centre parking.</p> <p>C) Opportunities should be sought to make the most of all existing parking, for example using office parking for retail outside working hours. Where shared parking is identified, overall provision should be reduced to make better use of land and more intensively use the parking that remains.</p> <p>D) If on-site parking is justified it should be publicly-available.</p> <p>E) Disabled persons parking should be provided as set out in Policy T6.5 Non-residential disabled persons parking.</p> <p>F) Where car parking is provided at retail development, provision for rapid electric vehicle charging should be made.</p> <p>G) Boroughs may consider amended standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in:</p> <ol style="list-style-type: none"> <li>1) A diversion of demand from town centres to out of town centres, undermining the town centres first approach.</li> <li>2) A significant reduction in the viability of mixed-use redevelopment proposals in town centre.</li> </ol>	<p>Given the Site is highly accessible by non-car modes of travel, including on foot, by cycle and by public transport and has a PTAL score of 6a ('excellent'), as demonstrated in the Transport Assessment, the majority of trips generated by the Women's Building and commercial uses are expected to be undertaken by walking and public transport. On this basis, no disabled parking is provided for the non-residential elements of the proposed development.</p>

Policy	Policy Title	London Plan (2021) Policy	Assessment
T6.4	<b>Hotel and leisure uses parking</b>	This policy is not relevant to the proposed development.	
T6.5	<b>Non-Residential Disabled Persons Parking</b>	<p>A) Disabled persons parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.</p> <p>B) Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with.</p> <p>C) Designated bays should be marked up as disabled persons parking bays from the outset.</p> <p>D) Enlarged bays should be large enough to become disabled persons parking bays quickly and easily via the marking up of appropriate hatchings and symbols and the provision of signage, if required i.e. if it can be demonstrated that the existing level of disabled persons parking is not adequate. The process for converting enlarged bays should be set out in a Parking Design and Management Plan and secured at the planning stage.</p> <p>E) Designated disabled persons parking bays and enlarged bays should be designed in accordance with the design guidance provided in BS8300: Vol 1.</p>	<p>Given the Site is highly accessible by non-car modes of travel, including on foot, by cycle and by public transport and has a PTAL score of 6a ('excellent'), as demonstrated in the Transport Assessment, the majority of trips generated by the Women's Building and commercial uses are expected to be undertaken by walking and public transport. On this basis, no disabled parking is provided for the non-residential elements of the proposed development.</p>
T7	<b>Delivering, Servicing and Construction</b>	<p>A) Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road.</p> <p>B) Development Plans, Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight strategies. These should seek to:</p> <ol style="list-style-type: none"> <li>1) reduce freight trips to, from and within these areas</li> <li>2) coordinate the provision of infrastructure and facilities to manage freight at an area-wide level</li> <li>3) reduce road danger, noise and emissions from freight, such as through the use of safer vehicles, sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.</li> </ol> <p>Such strategies should be developed through policy or through the formulation of a masterplan for a planning application.</p> <p>C) To support carbon-free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported.</p> <p>D) Development Plans should safeguard railheads unless it can be demonstrated that a railhead is no longer viable or capable of being made viable for rail-based freight-handling. The factors to consider in assessing the viability of a railhead include:</p>	<p>Plot D will provide residents' facilities including concierge to serve the development. The majority of residential deliveries will be delivered to this area. This will allow delivery providers to consolidate the trips to the development and reduce the chance of missed deliveries, which then require the provider to return to the Site.</p> <p>The development will have areas adjacent to each residential lobby entrance sized to accommodate a cargo bike, to enable couriers to safely park their bikes and deliver to a concierge/locker, whilst maintaining sight of the bike. The area can be protected from improper parking by CCTV enforcement or bollards.</p> <p>The planning application is accompanied by a Delivery and Servicing Plan and a Construction Logistics Plan which provides further details of the delivery and servicing arrangements.</p>

Policy	Policy Title	London Plan (2021) Policy	Assessment
		<ul style="list-style-type: none"> <li>• planning history, environmental impact and its relationship to surrounding land use context – recognising that the Agent of Change principle will apply</li> <li>• location, proximity to the strategic road network and existing/potential markets</li> <li>• the existing and potential contribution the railhead can make towards catering for freight movements by non-road modes</li> <li>• the location and availability of capacity at alternative railheads, in light of current and projected capacity and market demands.</li> </ul> <p>E) Consolidation and distribution sites at all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries.</p> <p>F) Development proposals for new consolidation and distribution facilities should be supported provided that they do not cause unacceptable impacts on London’s strategic road networks and:</p> <ol style="list-style-type: none"> <li>1) reduce road danger, noise and emissions from freight trips</li> <li>2) enable sustainable last-mile movements, including by cycle and electric vehicle</li> <li>3) deliver mode shift from road to water or rail where possible (without adversely impacting existing or planned passenger services).</li> </ol> <p>G) Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.</p> <p>H) Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.</p> <p>I) At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.</p> <p>J) Development proposals must consider the use of rail/water for the transportation of material and adopt construction site design standards that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites.</p> <p>K) During the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.</p>	
<b>T8</b>	<b>Aviation</b>	This Policy is not relevant to the Proposed development.	

Policy	Policy Title	London Plan (2021) Policy	Assessment
<b>T9</b>	<b>Funding transport infrastructure through planning</b>	<p>A) The Mayor will charge the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance such as Crossrail 2, and potentially other strategic transport infrastructure.</p> <p>B) In consultation with the Mayor, boroughs should identify a package of other strategically important transport infrastructure, as well as improvements to public realm, along with other funding streams to deliver them.</p> <p>C) Planning obligations (Section 106 agreements), including financial contributions, will be sought to mitigate impacts from development, which may be cumulative. Such obligations and contributions may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach.</p>	The development will contribute towards infrastructure through a CIL contribution and s106 obligations where relevant.
<b>Chapter 11 - Funding the London Plan</b>			
<b>DF1</b>	<b>Delivery of the Plan and Planning Obligations</b>	<p>A) Applicants should take account of Development Plan policies when developing proposals and acquiring land. Development proposals should provide the infrastructure and meet the other relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan. Where relevant policies in local Development Plan Documents are up to date, it is expected that viability testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery.</p> <p>B) Where relevant policies in local Development Plan Documents are up to date, if an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application.</p> <p>C) Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations, ensuring that developments remain acceptable in planning terms. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG.</p> <p>D) When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this:</p>	The development will contribute towards infrastructure through a CIL contribution and s106 obligations where relevant.

Policy	Policy Title	London Plan (2021) Policy	Assessment
		1) recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) recognise the importance of affordable workspace, and culture and leisure facilities in delivering good growth. E) Boroughs are also encouraged to take account of the infrastructure prioritisation in Part D in developing their Community Infrastructure Levy Charging Schedule and determining the infrastructure that will be funded through borough CIL.	
<b>Chapter 12 - Monitoring</b>			
<b>M1</b>	<b>Monitoring</b>	This Policy is not relevant to the Proposed development.	

## **Appendix IV**

**Assessment against LBI Core Strategy  
(2011) LBI Development Management  
Policies DPD (2013) and LBI Draft  
Local Plan (2019, as modified 2021)  
Policies**

# Former Holloway Prison

## 1. Assessment against LBI Core Strategy (2011)

Policy	Policy Title	LBI Core Strategy (2011)	Assessment
<b>Spatial Strategy</b>			
CS1	Archway	This policy is not relevant to the Development.	
CS2	Finsbury Park	This policy is not relevant to the Development.	
CS3	Nag's Head and Upper Holloway Road	<p>A) Continue to focus and promote a mix of retail opportunities along the main 'high streets' of Holloway Road and Seven Sisters Road to provide a better range of shops. The permanent and event-focused markets in the town centre will continue to play an important part in the retail offer. The existing town centre boundary will be extended along Holloway Road and Seven Sisters Road. The Development Management Policies will define the town centre boundary, mix of uses, and related frontages policies specific to the Nag's Head.</p> <p>B) Encourage development of underused land within Nag's Head, to maximise opportunities to provide new retail premises where possible, along with other employment uses. Some opportunities exist for residential development above existing retail uses. Opportunities will be identified in the Site Specific Allocations.</p> <p>C) Improvement of the public realm to enhance the environment for pedestrians and cyclists is a key priority to reduce the negative impact of the significant traffic flow. The streetscape will be improved, making it less cluttered, more inclusive, attractive and safer, with increased safety of access to the Sobell Leisure Centre. Better links will be encouraged across the busy Seven Sisters Road, Tollington Road/Isledon Road gyratory systems, and Holloway Road, and, if feasible in the long term, the gyratory system will be removed. In addition, opportunities for greening this corridor will be maximised through planting,</p>	The Site has a frontage onto Camden Road / Parkhurst Road which is included within the area covered by Policy CS3. Accordingly the development seeks to improve the urban design of the area and contribute towards creating a better pedestrian environment.



Policy	Policy Title	LBI Core Strategy (2011)	Assessment
		<p>green roofs and enhancement of existing open spaces. The historic environment should be used as an asset when developing improvements to the public realm.</p> <p>D) Maintaining and enhancing the provision of employment spaces, including those along Holloway Road towards Upper Holloway station, will be important in contributing to the diversity of the local economy and providing opportunities for small and medium businesses, capitalising on all key transport links.</p> <p>E) A supplementary planning document will be produced to create a masterplan for future development along Camden Road and the adjoining area to improve the urban design of the area and create a better pedestrian environment.</p> <p>F) The educational institutions in this area (London Metropolitan University and City and Islington College) will continue to play an important role in contributing to the local economy.</p> <p>G) Opportunities for evening economy and leisure activities within Nag's Head Town Centre will be encouraged to complement existing leisure and retail uses.</p> <p>H) The historic character of the area will be protected and enhanced, with high quality design encouraged within the town centre and along Holloway Road through a supplementary planning document.</p> <p>I) Links will be encouraged between the town centre and Arsenal (Emirates Stadium), to contribute to the wider commercial and tourism opportunities in the area.</p>	
<b>CS4</b>	<b>Highbury Corner and Holloway Road</b>	This policy is not relevant to the Development.	
<b>CS5</b>	<b>Angel and Upper Street</b>	This policy is not relevant to the Development.	
<b>CS6</b>	<b>King's Cross</b>	This policy is not relevant to the Development.	
<b>CS7</b>	<b>Bunhill and Clerkenwell</b>	This policy is not relevant to the Development.	
<b>CS8</b>	<b>Enhancing Islington's Character</b>	A) In the areas of Islington outside the key areas the scale of development will reflect the character of the area. The successful urban fabric of streets and squares, which is a key asset of the borough, will be maintained and poorer quality public realm will be improved. Less successful areas of the borough will be identified and improved. This will be achieved through conservation area policies and other Development Management Policies, supplementary planning documents, and by the council's public realm works.	The development has been designed to reflect the character of the area.
		B) Public realm improvements will enhance pedestrian and cycle routes, making it easier to travel sustainably through the borough. Open spaces will be maintained and enhanced to ensure they are inclusive, accessible spaces.	The development includes a significant improvement to public realm and seeks to enhance pedestrian and cycle routes.

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		<p>C) The businesses and shops which provide the mixed use character of Islington will be maintained through employment, retail and design policies. Islington should maintain a mix of uses located in small and large clusters throughout and avoid becoming a dormitory borough composed only of housing.</p> <p>D)</p> <p>E)</p>	<p>The development includes the provision of 1,822sqm Class E floorspace to be provided fronting Parkhurst Road (Plot B) or the Public Garden (Plot C), designed to meet the everyday and essential shopping and service needs of the new resident population and to activate the street frontage along Parkhurst Road.</p> <p>This part of the Policy is not relevant to the proposals.</p> <p>This part of the Policy is not relevant to the proposals.</p>
<b>Strategic Policies</b>			
<b>CS 9</b>	<b>Protecting and enhancing Islington's built and historic environment</b>	<p>High quality architecture and urban design are key to enhancing and protecting Islington's built environment, making it safer and more inclusive.</p> <p>A) The borough's unique character will be protected by preserving the historic urban fabric and promoting a perimeter block approach, and other traditional street patterns in new developments, such as mews. The aim is for new buildings to be sympathetic in scale and appearance and to be complementary to the local identity.</p> <p>B) The historic significance of Islington's unique heritage assets and historic environment will be conserved and enhanced whether designated or not. These assets in Islington include individual buildings and monuments, parks and gardens, conservation areas, views, public spaces and archaeology. Active management of conservation areas will continue, through a programme of proactive initiatives for the conservation-led regeneration of historic areas, and potential designation of new conservation areas. Archaeological Priority Areas will continue to be defined on the proposals map to assist in the management of these historic assets.</p> <p>C) Where areas of Islington suffer from poor layout, opportunities will be taken to redesign them by reintroducing traditional street patterns and integrating new buildings into surviving fragments of historic fabric. Reconfiguration based on streets and a perimeter block approach will be a key requirement for new developments, in particular housing estate renewal.</p> <p>D) All development will need to be based on coherent street frontages and new buildings need to fit into the existing context of facades. Housing developments should not isolate their residents from the surrounding area in 'gated' communities.</p> <p>E) New buildings and developments need to be based on a human scale and efficiently use the site area, which could mean some high density developments. High densities can be achieved through high quality design without the need for tall buildings. Tall buildings (above 30m high) are generally inappropriate to Islington's predominantly medium to low level character, therefore proposals for new tall buildings will not be supported. Parts of the Bunhill and Clerkenwell key area may contain some sites that could be suitable for tall buildings, this will be explored in more detail as part of the Bunhill and Clerkenwell Area Action Plan.</p>	<p>The development provides a series of spaces throughout the Site which will be well-designed, safe, accessible, inclusive, attractive and well-connected within and outside of the Site, relate to the local and historic context of the Site, and which are easy to understand, service and maintain.</p> <p>There are no designated archaeological heritage assets such as Scheduled Monuments within 0.5km of the Site. The nearest Scheduled Monument to the Site is located more than 2.5km from the Site.</p> <p>There are no statutorily listed buildings or locally listed buildings within the Site. There are four listed buildings within 250m of the Site including the Grade II Listed St Luke's Church, Verger's Cottage, former Baptist Church and no. 23 Carleton Road. There are also a number of locally listed buildings in the vicinity of the Site.</p> <p>The Site does not lie within a Conservation Area, however, is within 20m of Hillmarton Conservation Area (which lies to the south, south-west, east and north-east of the Site) and within 50m of Tufnell Park Conservation Area (which lies to the west and north-west of the Site). The Hillmarton Conservation Area is characterised by two and three storey Victorian semi-detached and terraced houses and the Tufnell Park Conservation Area is characterised by Edwardian and Victorian three storey housing.</p>

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		<p>F) New homes need to provide dual-aspect units with clear distinction between a public side and a quieter private side with bedrooms.</p> <p>G) High quality contemporary design can respond to this challenge as well as traditional architecture. Innovative design is welcomed, but pastiche will not be acceptable. The council will establish new advisory mechanisms to ensure the highest standards of architecture and environmental design.</p> <p>H) The Development Management Policies and other documents will provide further policies in relation to urban design and heritage. Detailed guidance on urban design in Islington is provided in the Islington Urban Design Guide (IUDG) Supplementary Planning Document.</p>	<p>The Site is not within a designated Archaeological Priority Area (APA) as defined by the LBI. Notwithstanding this, the application is accompanied by a Historic Environment Assessment prepared by Mola. This confirms that the development is unlikely to have a significant effect on heritage assets of archaeological interest.</p> <p>The planning application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment.</p> <p>The residential units have been designed to the highest design quality, taking into account the surrounding development context.</p> <p>The development does include buildings above 30m (thereby qualifying as a tall building). The proposal has therefore been fully assessed against London Plan Policy D9 and Islington Draft Local Plan Policy DH3.</p> <p>The proposals have sought to maximise the number of dual aspect homes, and where this has not been achieved, they are as a result of optimising the site capacity as required by London Plan Policy D3.</p>
<b>CS 10</b>	<b>Sustainable Design</b>	<p>The council will seek to minimise Islington's contribution to climate change and ensure that the borough develops in a way which respects environmental limits and improves quality of life. It will do this by:</p> <p>A) Promoting zero carbon development by:</p> <ul style="list-style-type: none"> <li>• requiring all development to demonstrate that it has minimised on-site carbon dioxide (CO<sub>2</sub>) emissions by using less energy through maximising energy efficiency, supplying energy efficiently using low carbon heating and cooling systems, and using on-site renewable energy generation. All major development should achieve an on-site reduction in total (regulated and unregulated) CO<sub>2</sub> emissions of at least 40% in comparison with total emissions from a building which complies with Building Regulations 2006, unless it can be demonstrated that such provision is not feasible. Major development in areas where connection to a decentralised energy network is possible should achieve an on-site reduction in total (regulated and unregulated) CO<sub>2</sub> emissions of at least 50% in comparison with total emissions from a building which complies with Building Regulations 2006, unless it can be demonstrated that such provision is not feasible. Further detail around these targets, including requirements for minor schemes will be set out in the Development Management Policies</li> </ul>	<p>The development seeks to respond to climate change and improve quality of life.</p> <p>The development promotes zero-carbon as follows:</p> <ul style="list-style-type: none"> <li>• The Energy Strategy demonstrates that the scheme has maximised energy efficiency with respect to the 40% CO<sub>2</sub> target. The development provides a low carbon heating system and on-site renewable energy generation (air source heat pumps and pvs).</li> <li>• There are no networks within reasonable proximity of the Site to enable connection. The closest existing Decentralised Energy Network is Shoreditch which lies 3,396m from the Site. The closest planned Decentralised Energy Network is Euston Road, which lies approximately 1,594m from the Site.</li> </ul>

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		<ul style="list-style-type: none"> <li>working with partners to promote and develop decentralised energy (DE) networks, with a particular focus on areas of the borough with the greatest potential for such networks (see figure 3.2). Existing DE networks within the borough will be protected and their expansion supported. All development will be required to contribute to the development of DE networks, including by connecting to such networks where these exist within the proximity of the development.</li> <li>requiring development to offset all remaining CO2 emissions associated with the building through a financial contribution towards measures which reduce CO2 emissions from the existing building stock. This contribution would be made on the basis of an established price per tonne of CO2 which would be based on the cost of reducing emissions from existing buildings, for example through retrofitting of energy efficiency measures. The proposed price per tonne and further details around implementation of the offset policy will be set out in the Sustainable Design SPD.</li> </ul>	<ul style="list-style-type: none"> <li>All remaining CO2 emissions will be offset through a financial contribution.</li> </ul>
		B) Requiring all development to achieve the highest feasible level of a nationally recognised sustainable building standard. Target levels of the Code for Sustainable Homes and Building Research Establishment Environmental Assessment Methodology (BREEAM) will be set out in the Development Management Policies.	The development proposals have sought to achieve the highest sustainable building standards.
		C) Requiring all development to demonstrate that it meets best practice water efficiency targets and, unless it can be shown not to be feasible, incorporates rain and grey water recycling. Residential schemes will be required to achieve a water efficiency target of 95 litres/person/day or less, with non-residential schemes achieving best practice efficiency levels as set out in Development Management Policies.	The Development achieves water consumption levels of 105 litres or less per head per day, as per London Plan Policy SI5.
		D) Requiring all development to demonstrate that it protects existing site ecology and makes the fullest contribution to enhancing biodiversity, both through on-site measures and by contribution to local biodiversity improvements.	The planning application is accompanied by an Ecology Assessment, included within the Environmental Statement, in order to ensure that the proposals manage impacts on biodiversity. The Ecological Assessment includes a series of recommendations in order to enhance and protect the ecological value of the Site. These recommendations have been incorporated into the proposed landscaping scheme and overall design. A net gain in biodiversity is secured.
		E) Requiring all development to demonstrate that it is designed to be adapted to climate change, particularly through design which minimises overheating and incorporates sustainable drainage systems (SUDS), with more specific targets to be set out in the Development Management Policies. Developments may also be required to contribute to wider local adaptation schemes which mitigate the impacts of climate change.	The development includes a number of SuDS features which have multiple benefits in ensuring the development is adapted to climate change. For example, the development incorporates green roofs which can assist in enhancing biodiversity and the urban greening of the Site.
		F) Requiring all development to minimise the environmental impact of materials, for example through use of sustainably-sourced, low impact and recycled materials, and to take all possible measures to minimise the impact of construction on the environment, including	A Circular Economy Statement has been submitted as part of this application and sets out details on how materials arising from demolition works will be re-used

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		<p>by minimising construction waste. Further detail will be set out in a Sustainable Design SPD.</p> <p>G) Requiring all development to be designed and managed to promote sustainability through their ongoing operation, for example through measures which raise awareness about environmental issues and support sustainable lifestyles, and to be adaptable to changing needs and circumstances over their lifetime. Further detail will be set out in a Sustainable Design SPD.</p> <p>H) Encouraging sustainable transport choices through new development by maximising opportunities for walking, cycling and public transport use, and requiring that all new developments are car-free. Key proposals to increase cycling and improve safety are set out in the Islington Cycling Action Plan.</p> <p>I) Working with partners and local communities to improve the environmental sustainability of the existing building stock and wider public realm, with a particular focus on increasing energy efficiency of homes and businesses.</p>	<p>and/or recycled. Waste management during both the demolition and construction periods will be undertaken in accordance with the Site Waste Management Plan, including that all relevant contractors will be required to investigate opportunities to minimise and reduce waste generation.</p> <p>Further to this, a Waste Management Plan, prepared by WSP, is submitted with the planning application, and takes into account the need to lessen the overall impact of waste generation.</p> <p>The application is accompanied by a Sustainable Design and Construction Statement which provides details on how the development proposals will seek to promote sustainable operation and a lifecycle.</p> <p>The development is proposed as 'car-free' with the provision of Blue Badge parking spaces only and promotes a variety of sustainable transport modes, including cycling as the proposals include cycle spaces that meet London Plan standards.</p> <p>Peabody entered into a PPA with London Borough Islington (LBI) in 2019 and has engaged in extensive pre-application discussions since this time, including with LBI and the GLA, Islington Design Review Panel, Members, as well as a comprehensive public consultation and stakeholder engagement. These discussions have covered the topics of Energy and Sustainability.</p> <p>The Development proposals follow the London Plan energy hierarchy and the submitted Energy Statement demonstrates how the Development aims to achieve zero-carbon targets, with a minimum on-site that exceeds the required reduction of at least 35% beyond Building Regulations.</p>
<b>CS 11</b>	<b>Waste</b>	<p>The council will encourage sustainable waste management by:</p> <p>A) Promoting waste reduction, re-use, recycling, composting and resource efficiency over landfill.</p> <p>B) Requiring developments to provide waste and recycling facilities which fit current and future collection practices and targets and are accessible to all.</p>	<p>Each residential dwelling provides adequate and easily accessible storage space for the collection of refuse, recycling and food waste.</p>

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		<p>C) Designating sites through the NLWP to meet an aggregated apportionment target across the seven North London boroughs. These sites will be the principal locations considered suitable for waste facilities.</p> <p>D) Protecting the Hornsey Street transfer and household recycling facility against change of use in line with policies set out in the NLWP.</p>	<p>Further detail is provided within the Waste Management Plan (prepared by WSP) that supports this planning application.</p>
<b>CS 12</b>	<b>Meeting the Housing Challenge</b>	<p>Islington will meet its housing challenge, to provide more high quality, inclusive and affordable homes by:</p> <p>A) Ensuring residents have a good quality of life while living in the second most densely developed borough in the country. This requires careful management of the design, layout, materials and locations of residential developments. To help achieve a good quality of life the residential space and design standards will be significantly increased from their current levels. Islington's Development Management Policies will set out these in detail. This will support the council's aim of retaining and encouraging middle income families and older residents alongside meeting the pressing need for more social-rented housing.</p> <p>B)</p> <p>C) Seeking to meet and exceed the borough housing target, which is set by the Mayor of London. The current annual target, which is in the process of being reviewed, requires Islington to build 992 conventional homes, 133 non-self contained units and to bring 33 vacant homes back into use during the period 2007/8 to 2016/7.</p> <p>D) Residential developments following and not exceeding the densities level set in the London Plan (currently shown in the London Plan density matrix), and complying with housing quality standards set out in other parts of the Local Development Framework.</p> <p>E) Requiring a range of unit sizes within each housing proposal to meet needs in the borough, including maximising the proportion of family accommodation in both affordable and market housing, and resisting the loss of existing units that are appropriate for the accommodation of families.</p> <p>F) Identifying areas where high levels of external noise and vibration may make residential development unacceptable, unless appropriate mitigating measures can be provided to the required standard. The transmission of noise from neighbouring buildings and within dwellings will also be minimised. The issue of noise will be addressed in more detail in the Development Management Policies.</p> <p>G) Provide affordable housing by: <ul style="list-style-type: none"> <li>• requiring that 50% of additional housing to be built in the borough over the plan period should be affordable.</li> </ul> </p>	<p>The residential units will achieve all requirements of Policy D6 of the London Plan. In the first instance, the development provides adequately sized rooms which are fit for purpose and are adaptable without differing between tenures. The development responds positively to the requirements for layout, orientation and form, outside space and usability and on-going maintenance.</p> <p>This part of the policy is not relevant to the development.</p> <p>985 units are proposed within the development (60% of which are affordable) which contributes to both LBI and London Plan housing targets.</p> <p>The development has sought to make the best use of land by following a design-led approach in order to optimise the capacity of the Site. The residential units have been designed to the highest design standards as set out within Policy D6 of the London Plan.</p> <p>The housing mix of the development, as set out in the accommodation schedule which accompanies the planning application, provides a range of unit sizes with regard to considerations such as local demand, the need to provide a range of unit types at different prices, the mix of uses and tenures in the scheme and the characteristics of the site and surrounding area, whilst seeking to optimise the development capacity of the Site.</p> <p>The proposals have sought to incorporate mitigation measures, as set out within the Noise Impact Assessment, to ensure the Development meets the required noise standards.</p> <p>The development provides 60% affordable housing (by unit). The first 50% is provided without grant. The Applicant has sought to maximise affordable housing</p>

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		<ul style="list-style-type: none"> <li>• requiring all sites capable of delivering 10 or more units gross to provide affordable homes on-site. Schemes below this threshold will be required to provide financial contribution towards affordable housing provision elsewhere in the borough.</li> <li>• seeking the maximum reasonable amount of affordable housing, especially social rented housing, from private residential and mixed-use schemes over the threshold set above, taking account of the overall borough wide strategic target. It is expected that many sites will deliver at least 50% of units as affordable, subject to a financial viability assessment, the availability of public subsidy and individual circumstances on the site.</li> <li>• seeking to increase delivery of affordable housing, especially social rented housing, from other sources such as 100% affordable housing schemes by Registered Social Landlords, building affordable homes on council's own land, and from a range of intermediate housing products available on the market.</li> <li>• delivering an affordable housing tenure split of 70% social housing and 30% intermediate housing.</li> <li>• ensuring affordable housing units are designed to a high quality and be fully integrated within the overall scheme.</li> </ul> <p>H) Requiring all new housing to comply with 'flexible homes' standards, with at least 10% wheelchair housing provided as part of all new developments.</p> <p>I)</p> <p>J)</p> <p>K)</p>	<p>beyond the minimum required amount of 50% and provides the additional 10% affordable housing utilising grant. This results in a total offer of 60% affordable housing. The affordable housing provision is compliant with London Plan Policy H4, H5 and H6, Core Strategy Policy CS12 and Draft Local Plan Policy H3. The development is eligible for the Fast Track Route. Nevertheless, LBI has requested the Applicant submit a Viability Assessment. In accordance with this request a Viability Assessment is submitted.</p> <p>The Development proposals meet the required tenure split as set out by the borough. This includes a tenure split of 70% social rent at Target Rent levels and 30% London Shared Ownership.</p> <p>The affordable housing units have been designed to the highest quality standards and are fully integrated within the scheme.</p> <p>The development will deliver 12% M4(3) wheelchair accessible provision by unit number across the scheme. The remaining units will be M4(2).</p> <p>This part of the policy is not relevant to the Development.</p> <p>This part of the policy is not relevant to the development.</p> <p>This part of the policy is not relevant to the Development.</p>
<b>CS 13</b>	<b>Employment Spaces</b>	<p>The council will provide employment space for businesses in the borough by:</p> <p>A) For new employment space:</p> <ul style="list-style-type: none"> <li>• encouraging new employment floorspace, in particular business floorspace, to locate in the CAZ and town centres where access to public transport is greatest.</li> <li>• requiring new business floorspace to be flexible to meet future business needs.</li> <li>• requiring a range of unit types and sizes, including those suitable for SMEs.</li> </ul> <p>B) For existing employment space:</p> <ul style="list-style-type: none"> <li>• safeguarding existing business spaces throughout the borough by protecting against change of use to non-business uses, particularly in the CAZ. Development which improves the quality and quantity of existing provision will be encouraged.</li> <li>• in exceptional circumstances loss of employment floorspace might be acceptable in line with considerations which will be set out in the Development Management Policies.</li> <li>• designating and protecting Vale Royal/Brewery Road as a Locally Significant Industrial Site. The Vale Royal/Brewery Road site will be retained for industrial/warehousing/employment land.</li> </ul>	<p>The Development provides 1,822sqm of flexible commercial floorspace at ground floor plots, providing a range of unit sizes. Taken as a whole, the development could support a total of between 46 and 269 gross FTE permanent jobs. This is expressed as a range given the employment generation could vary within the flexible Class E commercial space and within the Women's Building and reflects the minimum and maximum estimated job creation for the scheme.</p> <p>Therefore, the proposals contribute towards job generation in the local area and will provide a source of long-term employment for local people.</p>



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		<ul style="list-style-type: none"> <li>• Protecting units which are suitable for SMEs in terms of their type and size.</li> <li>C) Requiring development to provide jobs and training opportunities/support as follows: <ul style="list-style-type: none"> <li>• on-site construction training opportunities from developments of 10 residential units or above, hotels, student accommodation or hostels with 20 or more rooms, or with an uplift in business/employment floorspace of 500m2 or greater (Gross External Area (GEA)).</li> <li>• jobs and training opportunities, including apprenticeships, and contributions for childcare facilities where there is a proven need, from developments with an uplift in business/employment floorspace of 500m2 or greater (GEA).</li> <li>• either a proportion of small, micro and/or affordable workspace or affordable retail space, or contributions towards these, from major non-residential developments where the majority of floorspace is not in public education, community or social infrastructure uses.</li> </ul> </li> </ul>	<p>The Development will support employment, skills development, apprenticeship and other education and training opportunities in both the construction and end-use phases. This will be secured in the s106 legal agreement as appropriate.</p> <p>The Site is not located within a town centre or in the CAZ, however, does have a PTAL rating of 6a ('excellent'), therefore has strong public transport connectivity that the proposed employments spaces can benefit from.</p> <p>No affordable workspace is provided as part of the development.</p>
<b>CS 14</b>	<b>Retail and Services</b>	<p>A) Islington will continue to have strong cultural and community provision with a healthy retail and service economy providing a good range of goods and services for the people who live, work and study in the borough. This will both support the borough's economic development and enable people to shop locally. The council will protect and enhance the existing arts and cultural uses and encourage new arts and cultural uses, particularly within town centres.</p> <p>B) Islington has a hierarchy of town centres with two major town centres at Angel and Nag's Head, and two district town centres at Archway and Finsbury Park. Town centre boundaries will be defined in the Development Management Policies.</p> <p>C) Any new major retail and leisure development should be located in these town centres in accordance with the sequential assessment set out in Planning Policy Statement 4: Planning for Sustainable Economic Growth. Any increase in retail unit size should be supported by assessments which pass the test (in PPS4) of "preserving and enhancing the established character and diversity of the town centre."</p> <p>D) Islington will retain the primacy of retail shops in the borough's town centres and shopping areas and actively promote independent retail. Major retail developments will be required to provide a good supply of smaller retail units to maintain and enhance the diversity of shops in the borough and opportunities for small businesses. Specialist shopping areas, such as Fonthill Road and Camden Passage, will be actively promoted and considered when assessing future retail proposals. Shopping areas that are historic and/or locally important will also be identified in SPDs and their use and character will be protected. Through Development Management Policies, the council will prevent the amalgamation of smaller retail units to make larger single shops and also seek to limit the excessive loss of shops to other uses. Further detail on managing Islington's town centres and shopping areas will be provided in other development plan documents and town centre strategy SPDs.</p>	<p>The development includes the provision of a Women's Building which has been designed to serve a range of community uses, thus contributing to Islington's community provision.</p> <p>The development includes the provision of 1,822sqm Class E floorspace to be provided fronting Parkhurst Road (Plot B) or the Public Garden (Plot C), designed to meet the everyday and essential shopping and service needs of the new resident population and to activate the street frontage along Parkhurst Road.</p> <p>As the Site is not located within a town centre, this planning application is accompanied by a Main Town Centre Uses Impact Assessment prepared by WSP. The scope of this assessment was agreed with LBI during pre-application discussions.</p> <p>The Main Town Centre Uses Impact Assessment concludes that there are no sequentially preferable sites which can appropriately accommodate the proposed floorspace and meet the same needs as the development. Further, the development will not result in significant adverse impact on the vitality and viability of any existing, planned or committed centres within the catchment.</p>



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		<p>E) The town centres' streets will be actively managed to balance the demands on the public realm from business, particularly restaurants and cafés, and the need for easy pedestrian movement.</p> <p>F) Local shopping areas will be supported by creating coherent pedestrian environments and managing change of use from retail through Development Management Policies.</p> <p>G) Hotels and visitor accommodation will help to support the retail and service economy. The appropriate location for hotels and other visitor accommodation is within town centres. 10% of hotel bedrooms will be required to be wheelchair accessible, which shall be fully-fitted from the outset.</p>	<p>On this basis, it is considered that the Development passes the sequential test and fully complies with Policy CS14.</p>
<b>CS 15</b>	<b>Open Space and Green Infrastructure</b>	<p>The council will provide inclusive spaces for residents and visitors, and create a greener borough by:</p> <p>A) Protecting all existing local open spaces, including open spaces of heritage value, as well as incidental green space, trees and private gardens. Further policies will be identified in the Development Management Policies</p> <p>B) Improving the quality and function of open and green spaces for all users in accordance with the Green Space Assessment and Action Plan as well as the Inclusive Landscape Design Supplementary Planning Document.</p> <p>C) Improving access to open space and maximising opportunities for further provision across the borough, but particularly in those areas that currently have little or no open space locally (identified in Map 3.10 - Open space priorities) by:</p> <ul style="list-style-type: none"> <li>• creating new open spaces on underused land such as the council's housing land, underused car parking areas, roads and other void spaces. Underused spaces which could be further explored for use as open space are identified in Map 3.11 below. Sites will be formally identified in other parts of the Local Development Framework</li> <li>• making better use of housing amenity space so that it can help to provide an open space function</li> <li>• creating and enhancing civic spaces</li> <li>• seeking on site, or financial contributions, towards open and civic spaces from new development - details will be set out in the Development Management Policies</li> <li>• better utilising the Regent's Canal and the spaces around it</li> <li>• ensuring that existing and new open spaces are designed in an inclusive way, guided by the Inclusive Landscape Design SPD</li> <li>• creating and improving accessible links between open spaces in the borough, which encourage walking and promote cycling in line with Islington Cycling Action Plan.</li> </ul> <p>D) Protecting and enhancing biodiversity across the borough and addressing deficiencies in access to nature. Sites of Importance for Nature Conservation (SINCs) will be protected in</p>	<p>The development provides a significant amount of public open space and has incorporated significant landscaping to create high-quality open spaces and private amenity space and has sought to retain existing trees.</p> <p>The landscaping proposals have been designed in accordance with the relevant documents, including:</p> <ul style="list-style-type: none"> <li>• LBI Streetbook (2012)</li> <li>• Inclusive Design SPD (2014)</li> <li>• Islington Urban Design Guide SPD (2017)</li> <li>• London Plan (2021)</li> </ul> <p>The landscaping approach has been based on reducing cars, prioritising people and encouraging active travel modes. The development is 'car-free' with car parking limited to disabled car parking spaces.</p> <p>The development includes provision of a new pedestrian and cycle connection to Trecastle Way. The development includes an internal residential street which provides vehicular and cycle access. Further detail on Inclusive Access is included within the Design and Access Statement.</p> <p>The Site is not designated (statutorily or non-statutorily) for any nature conservation value.</p>

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		<p>line with their hierarchical importance and improvements to their biodiversity value will be supported. SINCs will be identified and designated in the Development Management Policies. Other key habitats, and priority species within them, will also be protected and enhanced including:</p> <ul style="list-style-type: none"> <li>• built environment</li> <li>• canals, waterways and standing water (this includes ponds)</li> <li>• parks and urban green spaces</li> <li>• private gardens, community gardens, and allotments</li> <li>• railside land</li> <li>• school grounds</li> <li>• woodland</li> <li>• acid grassland</li> <li>• cemeteries</li> <li>• other habitats deemed important for London</li> </ul> <p>Access to nature will be increased, including by improving the biodiversity value of the parks and gardens identified in Map 3.12. Further ways of increasing access to nature, along with other priorities for the protection and enhancement of habitats will be set out in the Biodiversity Action Plan.</p>	<p>The planning application is accompanied by an Ecology Assessment included within the Environmental Statement in order to ensure that the proposals manage impacts on biodiversity. The Ecological Assessment includes a series of recommendations in order to enhance and protect the ecological value of the Site. These recommendations have been incorporated into the proposed landscaping scheme and overall design.</p> <p>A net gain in biodiversity is secured.</p>
		E) Supporting local food production through the protection of existing food growing sites. Opportunities for new food growing spaces will be sought elsewhere including from new private developments.	The landscaping proposals for the development include opportunity for food growing within the nature garden.
		F) Maximising opportunities to 'green' the borough through planting, green roofs, and green corridors to encourage and connect green spaces across the borough, identifying streets, sites and strategic development areas where greening measures could happen. These opportunities will be identified through the Climate Change Adaptation Strategy, and the Biodiversity Action Plan, before being brought together with other opportunities in an Open Space and Green Infrastructure Strategy.	The development includes extensive green infrastructure through green space, green roofs and additional planting. Further detail is included in the Open Space and Recreation Assessment and Landscape Design Strategy prepared by Exterior Architecture which accompanies this planning application.
		G) Maximising the contribution of new and existing open spaces to broader sustainability objectives including SUDS, climate change adaptation and biodiversity. These opportunities will be set out in the aforementioned Open Space and Green Infrastructure Strategy.	The development includes a number of sustainable urban drainage systems including permeable paving, underground tanks, rain gardens and green roofs.
		H) Finally, Islington's two identified Locally Important Geological Sites (LIGS) will be protected, managed and enhanced.	The site does not fall within either of the Locally Important Geological Sites (LIGS).
CS 16	Play Space	<p>Opportunities for play in Islington will be maximised through:</p> <p>A) Improving the quality and function of existing play spaces so that they can provide more play opportunities for different age groups and disabled children, particularly in</p>	The Development includes 5,292sqm of play space. This quantum is based on 10sqm per child, as per London Plan Policy S4, and the number of children and age split

Policy	Policy Title	LBI Core Strategy (2011)	Assessment
		<p>those areas where opportunities for play are currently limited. This will be explored as part of the Play Strategy and Action Plan. Inclusive play spaces will be encouraged through the Inclusive Landscape Design Supplementary Planning Document.</p> <p>B) Increasing access to play spaces by making play spaces on housing estates welcoming to people from neighbouring areas - to be explored as part of the Play Strategy and Action Plan.</p> <p>C) Sustaining the level of existing formal play provision per child, promoting informal opportunities for play in the wider environment such as parks, open spaces, civic spaces and streets.</p> <p>D) Exploring opportunities for developing housing amenity spaces into inclusive play facilities.</p> <p>E) Requiring developers to provide new inclusive play space as part of new developments, particularly in those areas that have the greatest predicted increases in child population. Details will be set out in the Development Management Policies.</p>	<p>calculated with the GLA's Population Yield calculator based on the scheme mix and tenure of the residential units. This provides a stimulating environment with a wide range of opportunities for different age groups and abilities.</p> <p>The play space is located so that it can be accessed by children and young people and the scheme utilises safe and enclosed communal gardens for provision of additional play opportunities. 100% of the play space is provided at ground and first floor level to make it accessible to all age groups and abilities. This includes a large, public 'destination' play area at the heart of the site for all ages and abilities which will be publicly accessible. The play provision has been designed and located to enable passive surveillance. The scheme includes space for teenagers and young adults which are activated, sufficiently lit and well overlooked.</p>
<b>CS 17</b>	<b>Sports and Recreation Provision</b>	This Policy relates to existing and proposed sports and recreation facilities and is therefore not relevant to the Development.	
<b>Infrastructure and Implementation</b>			
<b>CS 18</b>	<b>Delivery and Infrastructure</b>	<p>The council will work with its partners to deliver the infrastructure required to support the development growth over the plan period as detailed in the Islington Infrastructure Delivery Plan.</p> <p>The council will require contributions from new development to ensure that the infrastructure needs associated with development will be provided for, and to mitigate the impact of development.</p>	The Development will contribute towards infrastructure through a CIL contribution and s106 obligations where relevant.
<b>CS19</b>	<b>Health Impact Assessments</b>	To promote health and reduce health inequalities, all major new development proposals will be required to conduct a prospective Health Impact Assessment (HIA). Funding will be sought from S106 developer contributions where longitudinal impact assessments are indicated.	A Health Impact Assessment, prepared by WSP, accompanies this planning application.
<b>CS 20</b>	<b>Partnership Working</b>	This policy relates to the Council establishing infrastructure governance arrangements within the Islington Strategic Partnership and therefore is not relevant to the Development.	

## 2. Assessment against LBI Development Management Policies (2013)

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
<b>Chapter 2 - Design and Heritage</b>			
DM2.1	Design	<p>A) All forms of development are required to be of high quality, incorporate inclusive design principles and make a positive contribution to the local character and distinctiveness of an area, based upon an understanding and evaluation of its defining characteristics. Permission will be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. Further details on design requirements in Islington are set out in the Islington Urban Design Guide, Streetbook, Inclusive Landscape Design and other Supplementary Planning Documents. This policy applies to all new developments including alterations and extensions to existing buildings.</p> <p>For a development proposal to be acceptable it is required to:</p> <ol style="list-style-type: none"> <li>i. be sustainable, durable and adaptable;</li> <li>ii. be safe and inclusive;</li> <li>iii. efficiently use the site and/or building;</li> <li>iv. improve the quality, clarity and sense of spaces around or between buildings;</li> <li>v. enhance legibility and have clear distinction between public and private spaces;</li> <li>vi. improve movement through areas, and repair fragmented urban form;</li> <li>vii. respect and respond positively to existing buildings, the streetscape and the wider context, including local architectural language and character, surrounding heritage assets, and locally distinctive patterns of development and landscape;</li> <li>viii. reinforce and complement local distinctiveness and create a positive sense of place;</li> <li>ix. sustain and reinforce a variety and mix of uses;</li> <li>x. provide a good level of amenity including consideration of noise and the impact of disturbance, hours of operation, vibration, pollution, fumes between and within developments, overshadowing, overlooking, privacy, direct sunlight and daylight, over-dominance, sense of enclosure and outlook;</li> <li>xi. not unduly prejudice the satisfactory development or operation of adjoining land and/or the development of the surrounding area as a whole;</li> <li>xii. consider landscape design holistically as part of the whole development. Landscape design should be set out in a landscape plan at an appropriate level of detail to the scale of development and address the considerations outlined in Appendix 12 of this document; and</li> <li>xiii. not result in an unacceptable adverse impact on views of local landmarks</li> </ol> <p>B) Development proposals are required to demonstrate, through the use of detailed, clear and accurate drawings and a written statement (Design and Access Statements where appropriate) how they have successfully addressed the elements of the site and its</p>	<ul style="list-style-type: none"> <li>• The development will be sustainable, durable and adaptable as set out within the Sustainable Design and Construction Statement.</li> <li>• The development will be safe and inclusive as set out within Inclusive Design Statement (included within the Design and Access Statement).</li> <li>• The design of the development has sought to efficiently use the site.</li> <li>• The development provides quality, clarity and sense of spaces around and between buildings; enhances legibility and create a clear distinction between public and private spaces; improve movement through areas, and repair fragmented urban form; respect and respond positively to existing buildings, the streetscape and the wider context, including local architectural language and character, surrounding heritage assets, and locally distinctive patterns of development and landscape; and reinforce and complement local distinctiveness and create a positive sense of place.</li> <li>• The development will sustain and reinforce a variety and mix of uses through the delivery of residential units, flexible commercial space and a Women's Building.</li> <li>• As set out within the Design and Access Statement, the development will provide a good level of amenity. Appropriate consideration of noise and the impact of disturbance, hours of operation, vibration, pollution, fumes between and within developments, overshadowing, overlooking, privacy, direct sunlight and daylight, sense of enclosure and outlook has been given to the design. The development would not prejudice the satisfactory development or operation of adjoining land and/or the development of the surrounding</li> </ul>

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
		<p>surroundings listed below. Greater onus for demonstrating this will be placed on major developments, and smaller developments on sites in prominent or sensitive locations:</p> <ul style="list-style-type: none"> <li>i. historic context, such as distinctive local built form, significance and character of any heritage assets, scale and details that contribute to its character as a place;</li> <li>ii. urban form, such as building lines, frontages, plot sizes and patterns, building heights, storey heights and massing;</li> <li>iii. architectural and design quality and detailing, such as colour, type, source and texture of detailing and materials used;</li> <li>iv. movement and spatial patterns, such as definition, scale, use, detailing and surface treatment of routes and spaces;</li> <li>v. natural features, such as topography, trees, boundary treatments, planting and biodiversity;</li> <li>vi. visual context, such as location and scale of landmarks, strategic and local and other site specific views, skylines and silhouettes, and scale and form of townscape set pieces or urban compositions;</li> <li>vii. an understanding of the significance of heritage assets that may be affected; and</li> <li>viii. safety in design, such as access, materials and site management strategies.</li> </ul> <p>C) The only locations in Islington where tall buildings may be suitable are set out in the Finsbury Local Plan (Area Action Plan for Bunhill and Clerkenwell). Any proposal for tall buildings must meet other design policies and have regard for the criteria set out in English Heritage/CABE's Guidance on tall buildings (2007).</p>	<p>area as a whole; and not result in an unacceptable adverse impact on views of local landmarks.</p> <ul style="list-style-type: none"> <li>• The development has considered landscape design holistically as part of the whole development, as set out within the Open Space and Recreation Assessment and Landscape Design Strategy.</li> <li>• The application is supported by a series of drawings and a Design and Access Statement which sets out how the design has addressed elements of the site and its surroundings. This is further supported by a Townscape, Visual and Above Ground Built Heritage Assessment, included within the Environmental Statement.</li> </ul> <p>The development includes buildings over 30m (thereby qualifying as a tall building). An assessment against relevant height policies is included in Section 7 of the Planning Statement.</p>
<b>DM2.2</b>	<b>Inclusive Design</b>	<p>A) All developments shall demonstrate that they:</p> <ul style="list-style-type: none"> <li>i. provide for ease of and versatility in use;</li> <li>ii. deliver safe, legible and logical environments;</li> <li>iii. produce places and spaces that are convenient and enjoyable to use for everyone, and</li> <li>iv. bring together the design and management of a development from the outset and over its lifetime.</li> </ul>	<p>The planning application is accompanied by an Inclusive Design Statement (included within the Design and Access Statement) which sets out how the proposals have been designed to achieve the highest standards of accessible and inclusive design.</p> <p>The proposals have been designed in accordance with the Principles of Inclusive Design, including placing people at the heart of the design process and providing buildings and environments that are convenient and enjoyable to use for everyone. Inclusive areas of public realm and play space are provided throughout the development, designed to engage people of all ages. Accessible seating will be provided adjacent to all play areas and throughout the landscape, with no more than 40m between rest opportunities.</p>

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
			<p>The site levels are rationalised as far as possible to create accessible entrances. Gently sloping gradients (less steep than 1:20) are proposed wherever possible within the constraints of boundary conditions and existing trees, minimising the installation of steps and ramps. Where the existing level differences between the Site and surrounding pedestrian routes could not be addressed with a gentle slope, ramps no steeper than 1:15 are proposed, with adjacent stepped routes and shared level landings. All aspects of the pedestrian routes through the site are designed to meet the criteria of Approved Document M, Volume 2, Category 3A.</p> <p>All entrances and communal areas to residential buildings will have finishes that assist people with visual impairments by providing sufficient visual contrast between key surfaces (floors, walls, ceilings and doors) and accessories (door handles, postboxes, dwelling identification, etc) and by minimising visual contrast where necessary to avoid the risk of confusion / discomfort.</p>
DM2.3	Heritage	<p><b>A) Conserving and enhancing the historic environment</b> Islington's historic environment is an irreplaceable resource and the council will ensure that the borough's heritage assets are conserved and enhanced in a manner appropriate to their significance. Development that makes a positive contribution to Islington's local character and distinctiveness will be encouraged.</p> <p><b>B) Conservation Areas</b></p> <p>i. The council will require that alterations to existing buildings in conservation areas conserve or enhance their significance. Similarly, new developments within Islington's conservation areas and their settings are required to be of high quality contextual design so that they conserve or enhance a conservation area's significance. Harm to the significance of a conservation area will not be permitted unless there is a clear and convincing justification. Substantial harm to the significance of a conservation area will be strongly resisted.</p> <p>ii. The council will require the retention of all buildings and structures which make a positive contribution to the significance of a conservation area. The appropriate repair and re-use of such buildings will be encouraged. The significance of a conservation area can be substantially harmed over time by the cumulative impact arising from the demolition of buildings which may individually make a limited positive contribution to</p>	<p>The Development has been designed to conserve and enhance the historic environment. The planning application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment.</p> <p>The Site does not lie within a Conservation Area, however, is within 20m of Hillmarton Conservation Area (which lies to the south, south-west, east and north-east of the Site) and within 50m of Tufnell Park Conservation Area (which lies to the west and north-west of the Site). The Hillmarton Conservation Area is characterised by two and three storey Victorian semi-detached and terraced houses and the Tufnell Park Conservation Area is characterised by Edwardian and Victorian three storey housing.</p> <p>The planning application is accompanied by a Townscape, Visual and Above Ground Built Heritage</p>

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
		<p>the significance of a conservation area. Consequently, the loss of a building which makes a positive contribution to a conservation area will frequently constitute substantial harm to the significance of the conservation area.</p> <p>iii. The council will resist the loss of spaces, street patterns, views, vistas, uses, trees, and landscapes which contribute to the significance of a conservation area.</p> <p>iv. The council will use its statutory powers to ensure that buildings and spaces within conservation areas that are at risk from neglect or decay are appropriately maintained and repaired.</p> <p>v. Planning applications are required to include a Heritage Statement which demonstrates a clear understanding of the significance of any heritage assets affected by proposals and the impact on their significance.</p>	<p>Assessment which assesses the impact of the development of the relevant heritage assets.</p>
		<p><b>C) Listed Buildings</b></p> <p>i. The significance of Islington's listed buildings is required to be conserved or enhanced. Appropriate repair and reuse of listed buildings will be encouraged.</p> <p>ii. The significance of a listed building can be harmed by inappropriate repair, alteration or extension. Proposals to repair, alter or extend a listed building must be justified and appropriate. Consequently a high level of professional skill and craftsmanship will be required. Proposals to repair, alter or extend a listed building which harm its significance will not be permitted unless there is a clear and convincing justification. Substantial harm to or loss of a listed building will be strongly resisted.</p> <p>iii. New developments within the setting of a listed building are required to be of good quality contextual design. New development within the setting of a listed building which harms its significance will not be permitted unless there is a clear and convincing justification, and substantial harm will be strongly resisted.</p> <p>iv. The best use for a listed building is usually that for which it was designed. However, where the original use of a listed building is demonstrably unviable other uses may be permitted provided they do not harm the significance of the listed building.</p> <p>v. The council will use its statutory powers to ensure that listed buildings at risk from neglect or decay are appropriately maintained and repaired. vi) Applications for listed building consent must be accompanied by a Heritage Statement which demonstrates a clear understanding of the significance of the affected listed building and of the impact on its significance</p>	<p>There are no statutorily listed buildings or locally listed buildings within the Site. There are four listed buildings within 250m of the Site including the Grade II Listed St Luke's Church, Verger's Cottage, former Baptist Church and no. 23 Carleton Road. There are also a number of locally listed buildings in the vicinity of the Site.</p> <p>The planning application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment which assesses the impact of the development of the relevant heritage assets.</p>
		<p><b>D) Registered historic parks and gardens, London squares and other heritage landscapes</b></p>	<p>This Part is not relevant as the Site is not a registered historic park, garden or other heritage landscape.</p>
		<p><b>E) Non-designated heritage assets</b></p> <p>Non-designated heritage assets, including locally listed buildings and shopfronts, should be identified early in the design process for any development proposal which may impact on their significance. The council will encourage the retention, repair and</p>	<p>Any other relevant non-designated heritage assets are identified in the Townscape, Visual and Above Ground Built Heritage Assessment which accompanies this planning application.</p>



Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
		<p>reuse of non-designated heritage assets. Proposals that unjustifiably harm the significance of a non-designated heritage asset will generally not be permitted.</p> <p><b>F) Archaeology and scheduled monuments</b></p> <p>i. The council will ensure the conservation of scheduled monuments and non-designated heritage assets with archaeological interest which are of demonstrably equivalent significance.</p> <p>ii. Archaeological priority areas and scheduled monuments are identified on the Policies Map and in Appendix 7. All planning applications likely to affect important archaeological remains are required to include an Archaeological Assessment.</p> <p>iii. Archaeological remains should be retained in situ. Where this cannot be achieved measures must be taken to mitigate the impact of proposals through archaeological fieldwork to investigate and record remains in advance of works, and subsequent analysis, publication and dissemination of the findings.</p> <p><b>G) Climate change</b></p> <p>i. Proposals that aim to mitigate, and adapt to, the effects of climate change should in the first instance explore all opportunities of enhancing energy efficiency and forms of providing renewable energy and improved adaptation to climate change without harming the significance of heritage assets.</p> <p>ii. Where conflict between climate change objectives and the conservation of heritage assets is unavoidable the public benefit of mitigating the effects of climate change will be weighed against any harm to the significance of heritage assets, in accordance with the development management principles in national, London and Islington planning policy.</p>	<p>There are no designated archaeological heritage assets such as Scheduled Monuments within 0.5km of the Site. The nearest Scheduled Monument is located more than 2.5km from the Site.</p> <p>The Site is not within a designated Archaeological Priority Area (APA) as defined by the LBI. Notwithstanding this, the application is accompanied by a Historic Environment Assessment prepared by Mola. This confirms that the Development is unlikely to have a significant effect on heritage assets of archaeological interest.</p> <p>The development has been designed to mitigate and adapt to the effects of climate change. This does not cause a conflict with conserving heritage assets.</p>
<b>DM2.4</b>	<b>Protected Views</b>	<p>A) The Mayor of London's strategic views will be protected and enhanced and the council will implement the London View Management Framework for the strategic views that cross Islington. These views are shown on the Policies Map</p> <p>B) Within Islington there are local views of St. Paul's Cathedral and of St. Pancras Chambers and Station, which the council will protect and enhance. These views are shown on the Policies Map. The local views protected are:</p> <ul style="list-style-type: none"> <li>• LV1: View from Farringdon Lane / Farringdon Road / Clerkenwell Road to St. Paul's Cathedral</li> <li>• LV2: View from St. John Street to St. Paul's Cathedral</li> <li>• LV3: View from the Angel to St. Paul's Cathedral</li> <li>• LV4: View from Archway Road to St. Paul's Cathedral</li> <li>• LV5: View from Archway Bridge to St. Paul's Cathedral</li> <li>• LV6: View from Amwell Street to St. Paul's Cathedral</li> <li>• LV7: View from Dartmouth Park Hill to St. Paul's Cathedral</li> <li>• LV8: View from Pentonville Road to St. Pancras Chambers and Station</li> </ul>	<p>The Site does lie within the viewing corridor of two LBI protected views:</p> <ul style="list-style-type: none"> <li>• Local View 4, Archway Road to St Paul's Cathedral</li> <li>• Local View 5, Archway Bridge to St Paul's Cathedral</li> </ul> <p>The planning application is accompanied by a Townscape, Visual and Heritage Assessment which fully assesses the impact of the development on the local views.</p> <p>The Site is not located within the Protected Vista of a designated London View Management Framework.</p>



Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
		<p>C) The council will produce management plans for all local views in a Supplementary Planning Document in accordance with the Mayor's London View Management Framework. Further policy and guidance for the management and protection of LV1 is provided in the Finsbury Local Plan (Area Action Plan for Bunhill and Clerkenwell).</p> <p>D) Redevelopment of buildings that currently adversely impact on the local or strategic view are required to enhance the view and the ability to appreciate the landmark within the views, and not infringe on any part of the defined view</p> <p>E) Where deemed necessary, applicants will need to provide appropriate supporting material to verify the visual impact of the development on the relevant views (Mayor's strategic views and/or local views).</p> <p>Details of the location and height of local views are given in Appendix 1</p>	
<b>DM2.5</b>	<b>Landmarks</b>	<p>A) The council will protect views of well-known local landmarks and will exercise stringent controls over the height, location and design of any building which blocks or detracts from important or potentially important views. The landmarks listed below are shown on the Policies Map, but this is not necessarily a comprehensive list. Planning applications likely to affect landmarks will be considered on an individual basis.</p> <p>B) The landmarks protected are:</p> <ul style="list-style-type: none"> <li>• LL1: St. Joseph's RC Church, Highgate Hill</li> <li>• LL2: St. Mary's CE Church Tower and Spire, Ashley Road</li> <li>• LL3: Boston Arms Dome, Junction Road/Dartmouth Park Hill</li> <li>• LL4: Camden Road New Church Tower and Spire, Camden Road</li> <li>• LL5: Caledonian Market Tower, Market Road</li> <li>• LL6: Union Chapel, Compton Terrace</li> <li>• LL7: St. Mary's Church Tower and Spire, Upper Street</li> <li>• LL8: St. John's RC Church, Duncan Terrace</li> <li>• LL9: Diespeker Chimney, 38 Graham Street</li> <li>• LL10: Angel Corner House Dome, 1 Islington High Street</li> <li>• LL11: The Cinema Tower, 7 Islington High Street</li> <li>• LL12: Engine and Pump House, New River Head</li> <li>• LL13: St. James' Church Tower and Spire, Clerkenwell Close</li> <li>• LL14: St. Luke's Obelisk Spire, Old Street</li> <li>• LL15: Leysian Mission Dome, City Road</li> <li>• LL16: Lowndes House, 1 City Road</li> <li>• LL17: Triton Court, Finsbury Square</li> <li>• LL18: Jubilee Clock Tower, Highbury Hill and Church Path</li> </ul> <p><i>Note: St. Pancras Station and Hotel (Chambers), in Camden, is also an important local landmark and views of it from Islington will be protected (Local View 8).</i></p>	The planning application is accompanied by a Townscape, Visual and Heritage Assessment which fully assesses the impact of the development on local landmarks (as identified in the Holloway Prison Site SPD).
<b>DM2.6</b>	<b>Advertisements</b>	This policy relates to advertisements and therefore is not relevant to the Development proposals.	

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
DM2.7	Telecommunications and utilities	This application is not for telecommunications and utilities equipment, or mobile phone network development, therefore this policy is not relevant to the Development proposals.	
<b>Chapter 3 - Housing</b>			
DM3.1	Mix of housing sizes	<p>A) All sites should provide a good mix of housing sizes.</p> <p>B) To ensure the range of housing sizes needed in the borough is provided, the housing mix required on all residential developments will be based on Islington's Local Housing Needs Assessment, and the requirements of any updated housing needs surveys and/or assessments prepared by or on behalf of the council.</p>	<p>The housing mix of the development, as set out in the accommodation schedule which accompanies the planning application, has sought to provide a mix that responds to LBI Draft Local Plan Table 3.2 which is based on the latest housing need evidence. The development also responds to advice from LBI's Housing Team regarding the social rent mix that the greater need is for 2 and 3 bedroom social rent accommodation.</p> <p>The social rent provision of 415 units includes 60 Extra Care social rent 1-bedroom homes which meet a specific need, in accordance with Draft Local Plan Policy H7.</p> <p>The development provides a mix of 1 to 4 bedroom units, including 696 family homes (2+ bedroom as defined in supporting text to Draft Local Plan H2).</p> <p>The mix is considered to provide an appropriate mix of units taking into account housing need, the characterises of the development and the proposed tenures, in accordance accord with London Plan Policy H10, Core Strategy Policy CS12, Development Management Policies DPD Policy DM3.1, and Draft Local Plan H2.</p>
DM3.2	Existing Housing	The Site does not contain any existing housing therefore this policy is not relevant to the Development.	
DM3.3	Residential Conversions and Extensions	The Development proposals do not involve any residential conversions or extensions therefore this policy is not relevant to the Development.	
DM3.4	Housing Standards	A) <b>Housing Standards</b>	The residential units will achieve all the requirements of Policy DM3.4 and Policy D6 of the London Plan.

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
		<p>All new housing developments (including conversions, Changes of Use, Houses in Multiple Occupation, and sheltered housing) are required to provide accommodation that meets the following criteria:</p> <ul style="list-style-type: none"> <li>i. Accommodation of adequate size, with acceptable shape and layout of rooms (with due consideration to aspect, outlook from habitable rooms, noise, ventilation, privacy, light).</li> <li>ii. Functional and useable space that has good provision for play, amenity and garden space.</li> <li>iii. Sufficient space for storage and utility purposes.</li> <li>iv. Built to be accessible and adaptable to meet changing occupier circumstances over the lifetime of the development.</li> <li>v. 10% of all new housing, calculated against the number of habitable rooms, is required to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. The wheelchair accessible units should be provided across all tenures and unit sizes, and integrated within the development. Each wheelchair housing unit is required to be single-storey, preferably on the ground floor. Where provided above ground floors there must be at least two suitable lifts available for use by each unit within a convenient distance from the front door of the units.</li> </ul>	<p>Specifically, the residential accommodation has been designed to be of the highest design quality as follows:</p> <ul style="list-style-type: none"> <li>i) All homes have been designed to meet or exceed the minimum space standards and with acceptable shape and layout of rooms and have been designed to maximise dual aspect, outlook and achieve acceptable amenity in terms of noise, ventilation, privacy and light</li> <li>ii) All homes have access to private external amenity space which is usable and functional and meets or exceeds minimum space standards</li> <li>iii) As shown on the accompany application drawings, all homes include sufficient space for storage and utility purposes</li> <li>iv) All homes have been designed to be accessible and adaptable to meet changing occupier circumstances over the lifetime of the development.</li> <li>v) 12% of homes will be designed as wheelchair accessible homes across all tenures and types or adaptable for residents who are wheelchair users. All wheelchair units above ground floor have access to two lifts</li> </ul>
		<p><b>B) Internal Floor Area</b></p> <ul style="list-style-type: none"> <li>i. All new residential developments, conversions and extensions are required to meet or exceed the minimum space standards set out in Table 3.2. For dwellings designed for more than six people, an extra 10m<sup>2</sup> is required for each additional occupant above the sixth person accommodated.</li> <li>ii. Built-in general internal storage space free of hot water cylinders and other obstructions, with a minimum internal height of 2 metres and a minimum area of 1.5m<sup>2</sup>, must be provided for 1-2 person dwellings, in addition to storage provided by furniture in habitable rooms. For each additional occupant an additional 0.5m<sup>2</sup> of storage space is required. These requirements are reflected in Table 3.2.</li> <li>iii. Rooms must be designed to function comfortably and efficiently for their intended purpose, including having regard to the size standards set out in Table 3.3 (London housing SPG room Standards)</li> <li>iv. Kitchens/diners should normally be provided as separate from living rooms as set out in the Accessible Housing in Islington SPD</li> </ul>	<ul style="list-style-type: none"> <li>i. All homes have been designed either meet or exceeds minimum space standards</li> <li>ii. As shown on the accompanying application drawings, all homes include sufficient space for storage and utility purposes</li> <li>iii. The homes include rooms which have been designed to function comfortably and efficiently for their intended purpose</li> <li>iv. The development provides a mix of typologies and therefore includes unit where the kitchen/diner is separate from living rooms and also units which have a combined living kitchen diner.</li> <li>v. The Design and Access Statement and accompanying plans provide details of the proposed overall floorspace and a breakdown of room sizes for the homes proposed</li> </ul>

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
		<ul style="list-style-type: none"> <li>v. At the planning application stage, applicants are required to provide details of proposed overall floorspace and a breakdown of room sizes, including occupancy. This may be provided within the Design and Access Statement or as a separate document.</li> <li>vi. Dwelling plans are required to demonstrate how dwellings will accommodate standard-sized furniture, access and activity space needs related to (a) the declared level of occupancy, and (b) standards required and described in the Accessible Housing SPD for flexible homes and/or wheelchair accessible standards.</li> <li>vii. Those details not evident on the dwelling plan are required to be detailed in the Design and Access Statement and relevant schedule of accommodation (for example, details such as level entry showers and the route for ceiling mounted hoists).</li> </ul>	<p>vi. The application drawings demonstrate how dwellings will accommodate furniture, access and activity space</p>
		<p>C) Floor to ceiling heights</p> <p>In new housing development all habitable rooms, kitchens and bathrooms are required to have a minimum floor to ceiling height of 2.6 metres (between finished floor level and finished ceiling level).</p> <p>In residential conversions, including extensions, where the original ceiling height is maintained, a lower ceiling height may be acceptable where it can be demonstrated that overall a good standard of daylight, ventilation and useable floorspace can be provided.</p>	<p>All homes have a floor to ceiling height of 2.6m.</p>
		<p><b>D) Dual Aspect</b></p> <ul style="list-style-type: none"> <li>i. New residential units are required to provide dual aspect accommodation, unless exceptional circumstances can be demonstrated.</li> <li>ii. For sites where dual aspect dwellings are demonstrated to be impossible or unfavourable, the design must demonstrate how a good level of natural ventilation and daylight will be provided for each habitable room.</li> </ul>	<p>The amount of dual aspect homes has been maximised through the design, including smaller buildings with more corners.</p> <p>Where single aspect units are proposed, these are as a result of optimising the site capacity as required by the London Plan and Islington draft Local Plan. All such single aspect units will achieve adequate levels of passive ventilation, daylight, privacy and will avoid overheating.</p>
		<p><b>E) Daylight and Sunlight</b></p> <ul style="list-style-type: none"> <li>i. The design of all residential development is required to maximise natural light into the room (subject to passive heating and cooling considerations). The glazing to all habitable rooms should be generous and aim to be not less than 20% of the internal floor area of the room.</li> <li>ii. All dwellings should provide for direct sunlight to enter the main habitable rooms for a reasonable period of the day. Living areas, kitchen and dining spaces should preferably receive direct sunlight.</li> </ul>	<p>The application is accompanied by a Daylight Sunlight Assessment which assesses the development against Policy DM3.4 (E).</p>
		<p><b>F) Approach and Entrance</b></p> <ul style="list-style-type: none"> <li>i. The overall approach to all entrances should be logical, legible and level or gently sloping.</li> </ul>	<p>All entrances have been designed to be logical, legible and level or gently sloping. Further to this, all entrances have been designed in accordance with the Inclusive Design Principles as required by the London Plan.</p>

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
		<p>ii. The overall travel distance between drop-off points (i.e. car parking spaces, car club bays, loading bays), the main entrance of a development, and the entrance of each individual dwelling should be kept to a minimum and demonstrably within the reach of ambulant disabled people. There should be a maximum total distance of 75 metres as required by the Accessible Housing in Islington SPD.</p> <p>iii. Common entrances should:</p> <ul style="list-style-type: none"> <li>• be visible from the public realm, clearly identified, illuminated and have weather protection;</li> <li>• have a door with 300mm of clear space to the pull side and a clear minimum opening width of 1,000mm.</li> <li>• have level access over the threshold and a level external landing in front with space to turn a wheelchair clear of any door swing.</li> </ul>	<p>The scheme complies with the required accessibility standards and distances from the car parking space to block entrance is a maximum of 50m. Common entrances are visible from the public realm, are clearly identified, illuminated and have suitable weather protection where needed. The dimensions of entrances accords with Building Regulations Part M. All residents will have step-free access to and from entrances.</p>
		<p><b>G) Shared Circulation</b></p> <p>i. In all new residential development the number of dwellings accessed from a single core must not be more than eight on each floor where feasible; a smaller number is preferable.</p> <p>ii. Common/shared entrances should lead to a hall large enough for people to manoeuvre with shopping and/or baby buggies, and in wheelchairs, with ease.</p> <p>iii. All dwellings should be provided with step-free or lift access.</p> <p>iv. Communal circulation corridors should be a minimum of 1,200mm wide, the preferred width is 1,500mm. Where they have an unobstructed width of less than 1,500mm, communal corridors should have wheelchair turning spaces at reasonable intervals.</p> <p>v. Access cores must provide an access control system, with entry phones in all dwellings linked to a main front door with remote electronic lock release.</p>	<p>i. There is a maximum of 8 units per core in all blocks, apart from the Extra Care provision to Building E1 which has 12 units per core. This core is generously sized to promote interaction between residents and benefits from natural daylight.</p> <p>ii. Common/shared entrances lead to sufficiently sized hallways.</p> <p>iii. All dwellings are provided with step-free access.</p> <p>iv. Communal circulation corridors have been designed in accordance with Building Regulations Part M.</p> <p>v. Details of the access control system are included in the Design and Access Statement.</p>
		<p><b>H) Circulation in new homes</b></p> <p>i. The width of front doors to dwellings, internal doors and hallways should conform to the specifications set out in the Accessible Housing in Islington SPD and the London Housing SPG.</p> <p>ii. The design of dwellings over more than one-storey is required to provide space for (a) provision of a stair lift, and (b) a suitably identified space for a through-the-floor lift from the entrance level.</p> <p>iii. Space for turning a wheelchair shall be provided in living rooms, dining rooms and in at least one bedroom.</p>	<p>i. The width of front doors to dwellings, internal doors and hallways accords with Building Regulations Part M.</p> <p>ii. Detail regarding access within units is provided in the Design and Access Statement.</p> <p>iii. The development includes 12% units designed to Building Regulations M4(3) with the remaining units designed in accordance with Building Regulations M4(2).</p>
<b>DM3.5</b>	<b>Private outdoor space</b>	<p>A) All new residential development and conversions will be required to provide good quality private outdoor space in the form of gardens, balconies, roof terraces and/or glazed ventilated winter gardens.</p> <p>B) Where buildings utilise roofs to provide private outdoor space and other outdoor amenity space the proposal should take into consideration issues of design,</p>	<p>All homes will have dedicated private amenity space in the form of a garden, terrace or balcony which meet or exceed the minimum space standards. All private external amenity space have a depth and width of at least 1.5m.</p>

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		<p>overlooking and crime prevention. Use of roofs for amenity purposes will need to be balanced with the use for green roofs and renewable energy equipment through careful design which integrates the benefits for amenity, biodiversity and carbon reduction.</p> <p>C) The minimum requirement for private outdoor space is 5m2 on upper floors and 15m2 on ground floors for 1-2 person dwellings. For each additional occupant, an extra 1m2 is required on upper floors and an extra 5m2 on ground floors up to a minimum of 30m2 for family housing (three bedroom residential units and above).</p> <p>D) All new build residential developments and, where practicable, residential conversions should provide step-free access and a level threshold from homes to private outdoor space.</p> <p>E) Balconies and other private external spaces should have a depth and width of not less than 1.5 metres.</p> <p>F) Any basement and/or ground floor unit should have a defensible space not less than 1.5 metres in depth in front of any window to a bedroom or habitable room.</p>	<p>The development includes some roof level amenity space for residents, although no play space is proposed at roof level. The development also includes green roofs to ensure there are sufficient benefits for amenity, biodiversity and carbon reduction.</p> <p>All ground floor units will have defensible space of at least 1.5 metres in depth in front of any window to a bedroom or habitable room.</p>
<b>DM3.6</b>	<b>Play Space</b>	<p>A) All major residential developments are required to make provision for play, based on anticipated child yield. Provision shall be 5m2 of private/informal play space per child (including semi-private outdoor space, private outdoor space and gardens suitable for play).</p> <p>B) Developments in excess of 200 residential units or 10,000m2 gross external area and developments where a specific need has been identified in a Development Plan Document are required to provide on-site, publicly accessible formal play space, working towards the overall London Plan standard of 10m2 per child (including private/informal play space).</p> <p>C) All proposed provision of new play space within development sites should be designed in partnership with Islington Council, to best practice standards. A landscape plan should be submitted with all major residential planning applications, which shall include a detailed design for play provision. The design of play provision should be inclusive, in accordance with the council's Inclusive Landscape Design SPD and the Islington Play Strategy.</p> <p>D) All major residential developments that provide play space on site should be accompanied by a Play Space Management and Maintenance Plan to ensure the play space is maintained thereafter. This plan shall be adhered to as agreed and conditioned by the council.</p>	<p>The Development includes 5,292sqm of playspace. This quantum is based on 10sqm per child and the number of children and age split calculated with the GLA's Population Yield calculator based on the scheme mix and tenure of the residential units. This excludes the 60 Extra Care Units as these homes will be subject to an occupancy age restriction and will therefore not generate child occupants. A copy of the child yield calculator is included within the Open Space and Recreation Assessment and Landscape Design Strategy prepared by Exterior Architecture which accompanies this planning application.</p> <p>Peabody has engaged with Islington Council in extensive pre-application discussions, within which play space was discussed. The play provision is inclusive and as such is not segregated by tenure. Details regarding play space management and maintenance can be found within the Open Space and Recreation Assessment and Landscape Design Strategy, prepared by Exterior Architecture, that accompanies this planning application.</p>

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<b>DM3.7</b>	<b>Noise and Vibration (residential uses)</b>	<p>A) All residential development proposals shall demonstrate how potential adverse noise impact on and between dwellings will be mitigated by housing layout, design and materials.</p> <p>B) The layout of adjacent dwellings and the location of lifts and circulation spaces is required to limit the transmission of sound to noise sensitive rooms within dwellings.</p> <p>C) Sufficient sound insulation with reasonable resistance to airborne sounds and impact sounds shall be installed in all walls and floors between and within dwellings, and between dwellings and public and/or communal areas.</p> <p>D) Residential developments should be adequately separated from major sources of noise, such as road, rail and certain types of development. Mitigation will be required where the noise environment necessitates this. Noise exposure categories will be used to assess applications. New residential development should wherever possible be sited away from noise generating land uses.</p> <p>E) Proposals for residential development adjacent to railway lines (or other sites that may be subject to vibration) should incorporate adequate mitigation to ensure a good standard of amenity for future occupants.</p>	<p>For the reasons set out in the Noise Chapter of the ES, and the standalone Noise Assessment, the development will avoid significant adverse noise impacts on health and quality of life, whilst existing noise generating uses will not place unreasonable restrictions or impacts upon the Development.</p>
<b>DM3.8</b>	<b>Sheltered Housing and Care Homes</b>	<p>A) The council will support the provision of sheltered housing and care homes provided the development will be:</p> <ol style="list-style-type: none"> <li>i. suitable for the intended occupiers in terms of the standard of facilities and the level of independence, and provide the necessary level of supervision, management and care/support;</li> <li>ii. accessible to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers; and</li> <li>iii. a suitable use for the site considering the surrounding neighbourhood, and contribute to mixed and balanced communities.</li> </ol> <p>B) The council will resist development which involves the loss of floorspace in sheltered housing and care homes unless either:</p> <ol style="list-style-type: none"> <li>i. adequate replacement accommodation will be provided that satisfies A (i) to (iii) above; or</li> <li>ii. the applicant can robustly demonstrate that there is a surplus over a long-term of this housing type in Islington; or</li> <li>iii. it can be demonstrated that the existing accommodation is unsatisfactory for modern standards and/or not fit for purpose and the development would provide accommodation to meet an identified acute need, which may include social rented housing.</li> </ol> <p>C) 10% of all new housing, calculated against habitable rooms, is required to be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. The wheelchair accessible units should be provided across all tenures and deliver appropriate unit sizes.</p>	<p>This policy applies to Sheltered Housing and Care Homes which are not proposed as part of the Development. Notwithstanding this, the Development does include Extra Care Units.</p> <p>During pre-application discussions, LBI sought the provision of Extra Care Units and therefore the development includes the provision of 60 self-contained Extra Care Units within Building E1.</p> <p>The Extra Care Units have been designed in accordance with the following principles as set out in the London Plan:</p> <ul style="list-style-type: none"> <li>• It is proposed that all of the Extra Care Units would be social rent. This would form part of the overall affordable housing offer for the scheme and satisfies Policies H4 and H5;</li> <li>• Policy D7 seeks 10% M4(3) homes and 90% M4(2). All of the Extra Care Units are designed as M4(3) homes, exceeding the policy requirement. This provision contributes to the 12% site wide provision of M4(3) homes.</li> <li>• Policy D5 Part B sets five criteria that proposals should achieve:</li> </ul>

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			<ul style="list-style-type: none"> <li>○ The proposal has been designed to take into account London's diverse population. The Extra Care Units form part of a wider scheme and contribute to a mixed and balanced community.</li> <li>○ The proposal provides high quality people focused spaces that are designed to facilitate social interaction and inclusion. Communal facilities including a garden are provided at ground floor for all residents of the Extra Care Units to use.</li> <li>○ The Extra Care Units are provided with their own entrance which lies adjacent to the internal road and opposite the public park. This is convenient and welcoming.</li> <li>○ The proposal is design to be entered, used and exited safely, easily and with dignity for all. Two lifts are provided.</li> <li>○ The proposal has been designed to incorporate safe and dignified emergency evacuation for all building users. Two lifts are proposed.</li> <li>● Safe storage and charging facilities for residents' mobility scooters is provided at lower ground level. All spaces have charging facilities.</li> <li>● The site includes the provision of accessible parking bays at a ratio 3% of the residential dwellings. The scheme also provides servicing bays and the Transport Assessment, prepared by Velocity, sets out that this could also be used for drop-off and pick up activity. There are accessible parking bays and a loading bay along the internal road adjacent to Plot E.</li> </ul>
<b>DM3.9</b>	<b>Houses in Multiple Occupation , hostels and student</b>	The development does not propose new HMOs, hostels or student accommodation therefore this policy is not relevant to the proposals.	



Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
	accommodation		
<b>Chapter 4 – Shops, culture and services</b>			
<b>DM4.1</b>	<b>Maintaining and promoting small and independent shops</b>	This Policy is not relevant to the development.	
<b>DM4.2</b>	<b>Entertainment and the night-time economy</b>	<p>A) Entertainment and night-time activities are generally appropriate in Town Centres where:</p> <ul style="list-style-type: none"> <li>i. they are compatible with other main Town Centre uses;</li> <li>ii. there would not be a significant adverse effect on amenity, particularly residential amenity; and</li> <li>iii. there is not an over-concentration of similar types of use, as assessed in relation to Policy DM4.3.</li> </ul> <p>B) Entertainment and night-time activities are generally inappropriate outside Town Centres*. Where proposed outside Town Centres, applicants will need to demonstrate that such uses will not result in adverse impacts, including cumulative impacts, as assessed in relation to Policy DM4.3, and are consistent with other policies relating to development outside Town Centres.</p>	The Site is not located within a Town Centre. Notwithstanding this, the development includes the provision of 1,822sqm Class E floorspace to be provided fronting Parkhurst Road (Plot B) or the Public Garden (Plot C), designed to meet the everyday and essential shopping and service needs of the new resident population and to activate the street frontage along Parkhurst Road. This is in accordance with the Holloway Prison SPD which sought active uses along Parkhurst Road and Camden Road.
<b>DM4.3</b>	<b>Location and Concentration of Uses</b>	<p>A) Proposals for cafés, restaurants, drinking establishments, off licences, hot food takeaways, lap dancing clubs, nightclubs, casinos, betting shops, amusement centres and other similar uses will be resisted where they:</p> <ul style="list-style-type: none"> <li>i. Would result in negative cumulative impacts due to an unacceptable concentration of such uses in one area; or</li> <li>ii. Would cause unacceptable disturbance or detrimentally affect the amenity, character and function of an area.</li> </ul> <p>B) Proposals for drinking establishments, off licences, hot food takeaways, lap dancing clubs, nightclubs, casinos, betting shops, amusement centres and other similar uses will be resisted where they are in proximity to schools or sensitive community facilities.</p>	<p>The development includes the provision of 1,822sqm Class E floorspace to be provided fronting Parkhurst Road (Plot B) or the Public Garden (Plot C), designed to meet the everyday and essential shopping and service needs of the new resident population and to activate the street frontage along Parkhurst Road.</p> <p>The development seeks Class E use. This would not allow for drinking establishments, hot food takeaways, lap dancing clubs, nightclubs, casinos, betting shops, or amusement centres.</p>
<b>DM4.4</b>	<b>Promoting Islington's Town Centres</b>	<p>The council will seek to maintain and enhance the retail and service function of Islington's four Town Centres, which are designated on the Policies Map and shown on Maps 4.1 to 4.4.</p> <p>A) Applications for more than 80m<sup>2</sup> of floorspace for uses within the A Use Classes, D2 Use Class and for Sui Generis main Town Centre uses should be located within designated Town Centres. Where suitable locations within Town Centres are not available, Local Shopping Areas or edge-of-centre sites should be chosen. Where this is not possible, out-of-centre sites may be acceptable where:</p>	The development includes the provision of 1,822sqm Class E floorspace to be provided fronting Parkhurst Road (Plot B) or the Public Garden (Plot C), designed to meet the everyday and essential shopping and service needs of the new resident population and to activate the street frontage along Parkhurst Road.

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
		<p>i. Alternative sites within Town Centres, Local Shopping Areas and edge-of-centre locations have been thoroughly investigated;</p> <p>ii. the development would not individually, or cumulatively with other development, have a detrimental impact on the vitality and viability of Town Centres and Local Shopping Areas within Islington or in adjacent boroughs, or prejudice the prospect for further investment needed to safeguard their vitality and viability; and</p> <p>iii. the development would be accessible to all by a sustainable choice of means of transport, and would not prejudice the overall aim of reducing the need to travel.</p> <p>B) For applications proposing more than 80m<sup>2</sup> of floorspace within the A Use Classes, D2 Use Class and for Sui Generis main Town Centre uses within the Central Activities Zone, Part A does not apply. Applications for such uses within the Central Activities Zone must demonstrate that:</p> <p>i. the development would not individually, or cumulatively with other development, have a detrimental impact on the vitality and viability of Town Centres within Islington or in adjacent boroughs, or prejudice the prospect for further investment needed to safeguard their vitality and viability;</p> <p>ii. proposed uses can be accommodated without adverse impact on amenity; and</p> <p>iii. the proposal would support and complement existing clusters of similar uses within or adjacent to the Central Activities Zone, particularly important retail frontages.</p> <p>C)</p> <p>D)</p> <p>E)</p>	<p>As the Site is not located within a town centre, this planning application is accompanied by a Main Town Centre Uses Impact Assessment prepared by WSP. The scope of this assessment was agreed with LBI during pre-application discussions.</p> <p>The Main Town Centre Uses Impact Assessment concludes that there are no sequentially preferable sites which can appropriately accommodate the proposed floorspace and meet the same needs as the development. Further, the development will not result in significant adverse impact on the vitality and viability of any existing, planned or committed centres within the catchment.</p> <p>Indeed, the proposed floorspace will be largely supported by its new resident population and it is an integral part of a well-designed redevelopment which offers significant benefits for the local community including the regeneration benefits of the re-use of a large, prominent and under-used site; significant local employment opportunities firstly, in its construction and subsequently, in the delivery of Class E floorspace; and important social benefits from the new Women's Building proposed.</p> <p>The Site has a PTAL rating of 6a ('excellent') demonstrating its accessibility by sustainable means of transport, and as such will not prejudice the overall aim of reducing the need to travel.</p> <p>Part C-E of this Policy are not relevant to the development.</p>
<b>DM4.5</b>	<b>Primary and Secondary Frontages</b>	The Site is not located within a Primary or Secondary Frontage; therefore, this Policy is not relevant to the proposals.	
<b>DM4.6</b>	<b>Local Shopping Areas</b>	The Site is not located within a Local Shopping Area therefore this policy is not relevant to the proposals.	

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
DM4.7	Dispersed Shops	There are no existing shops currently on the Site, therefore this policy is not relevant to the proposals.	
DM4.8	Shopfronts	A)	The development includes the provision of 1,822sqm Class E floorspace to be provided fronting Parkhurst Road (Plot B) or the Public Garden (Plot C), designed to meet the everyday and essential shopping and service needs of the new resident population and to activate the street frontage along Parkhurst Road. The elevations have been carefully designed to provide high quality commercial units which include high floor to ceiling heights.  Part A and B of this Policy are not relevant to the development.
		B)	
		C) The council will expect proposals for new shopfronts and alterations to existing shopfronts to demonstrate a high quality of design, which complements the original design, proportions, materials and detailing of the shopfront, surrounding street scene and the building of which it forms a part.	
		D) Blinds, canopies or shutters, where acceptable in principle, must be appropriate to the character of the shopfront and its setting. External security grilles will not normally be permitted. In conservation areas rigid and gloss finish blinds will generally be unacceptable.	
		E) Illumination to shopfronts must be sited and designed so as not to cause visual intrusion from light pollution into adjoining or nearby residential properties. Flashing internal or external lighting, and/or internally illuminated box lights will not be permitted.	
		F) Shop signage should generally be limited to the strip above the main shopfront and below the upper floor, plus one projecting sign at the same height. The council will resist proposals for further advertising additional to the name of the shop.	
		G) New shopfronts must be designed to allow equal access for all users, incorporating a Best Practice approach to access and inclusion. The use of pavements, where permitted, should not create an obstruction and should be designed so that the pavement is equally accessible for all users.	
		H) Proposals are required to take account of the council's Shopfront Design Guide.	
DM4.9	Markets and Specialist Shopping Areas	The Site does not contain any existing traditional street markets or specialist shopping areas; therefore, this policy is not relevant to the development.	
DM4.10	Public Houses	Neither the Site, nor the development, provides any Public Houses, therefore this policy is not relevant to the development.	
DM4.11	Hotels and Visitor Accommodation	The development does not include any hotels or visitor accommodation therefore this policy is not relevant to this planning application.	
DM4.12	Social and Strategic Infrastructure and	A) The council will not permit any loss or reduction in social infrastructure uses unless: <ul style="list-style-type: none"> <li>i. a replacement facility is provided on site which would, in the council's view, meet the need of the local population for the specific use; or</li> <li>ii. the specific use is no longer required on site. In such circumstances, the applicant must provide evidence demonstrating:</li> </ul>	The Holloway Prison Site SPD (2018) refers to the prison as social infrastructure. The Development Management Policies DPD defines social infrastructure as community spaces/facilities, emergency services and education facilities, noting it includes facilities defined as

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	<b>cultural facilities</b>	<p>a) that the proposal would not lead to a shortfall in provision for the specific use within the local catchment;</p> <p>b) that there is either no demand for another suitable social infrastructure use on site, or that the site/premises is no longer appropriate for social infrastructure uses; and</p> <p>c) any replacement/relocated facilities for the specific use provide a level of accessibility and standard of provision at least equal to that of the existing facility.</p> <p>B) The council will seek the provision of new social infrastructure and cultural facilities as part of large mixed-use developments. Developments that result in additional need for social infrastructure or cultural facilities will be required to contribute towards enhancing existing infrastructure/facilities, or provide/contribute towards new infrastructure/facilities. This contribution will be addressed through CIL and/or section 106 obligations, as appropriate.</p> <p>C) New social infrastructure and cultural facilities, including extensions to existing infrastructure and facilities, must:</p> <ol style="list-style-type: none"> <li>i. be located in areas convenient for the communities they serve and accessible by a range of sustainable transport modes, including walking, cycling and public transport;</li> <li>ii. provide buildings that are inclusive, accessible, flexible and which provide design and space standards which meet the needs of intended occupants;</li> <li>iii. be sited to maximise shared use of the facility, particularly for recreational and community uses; and</li> <li>iv. complement existing uses and the character of the area, and avoid adverse impacts on the amenity of surrounding uses.</li> </ol> <p>D) New cultural facilities that are expected to attract significant numbers of visitors should be located in the Central Activities Zone or the Town Centres.</p> <p>E) The loss and/or Change of Use of cultural facilities such as arts venues, theatres, cinemas, public galleries and community art centres will be strongly resisted.</p> <p>F) The installation, renewal or alteration of any strategic infrastructure which requires planning permission will generally be supported unless:</p> <ol style="list-style-type: none"> <li>i. it would result in the loss of a site which, by virtue of its location, would be more suitable for employment or residential uses; or</li> <li>ii. it gives rise to unacceptable noise, amenity (particularly residential amenity) and/or environmental issues.</li> </ol>	<p>community and social facilities. The Development Management Policies DPD defines community and social facilities as facilities that are available to, and serve the needs of, local communities and others and are often funded in some way by a grant or investment from a government department or public body or the voluntary sector. Social and community facilities are comprised of buildings and external spaces. They include buildings which accommodate social services such as day-care centres, luncheon clubs, and drop-in centres. Other facilities include education and training facilities including early years providers, schools, colleges and universities, health facilities, youth centres, libraries, community meeting facilities, community halls and policing facilities. The social and community facilities are generally in Use Classes C2, D1, D2 and possibly some Sui Generis uses.</p> <p>The Holloway Prison Site SPD seeks a Women's Building as part of the redevelopment of the Site that incorporates safe space to support women in the criminal justice system and services for women. This is carried forward into the emerging allocation for the Site in the Draft Local Plan. Neither the SPD nor Draft Local Plan specify a minimum or maximum required size for the facility. LBI published a draft Women's Building Development Brief in June 2020 which sought a facility of between 800sqm to 1,200sqm.</p> <p>The development exceeds the range set out in the draft Women's Building Development Brief (June 2020) and includes the provision a 1,489sqm Women's Building located to Plot C. The facility incorporates safe space to support women in the criminal justice system and services for women. This accords with Policy DM4.12 as follows:</p> <ul style="list-style-type: none"> <li>• The Women's Building is located in an area convenient for the community it will service and is accessible by a range of sustainable transport</li> </ul>

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			<p>modes, including walking, cycling and public transport.</p> <ul style="list-style-type: none"> <li>• The Women's Building is inclusive, accessible, flexible, sustainable and provides design and space standards which meet the needs of intended occupants.</li> <li>• Given the highly accessible nature of the Site to public transport, the development is 'car free', with the exception of accessible spaces to serve the residential element of the development. A series of loading bays are provided across the development which could be utilised for drop-off/pick-up facilities for disabled people should the Council consider this necessary.</li> <li>• The Women's Building has been sited to maximise use of the facility. The final operator/s of the Women's Building has not yet been determined but it may be shared by multiple women's services providers. Given the nature of the facility there is limited scope for sport and recreation, however opportunities for these activities is provided in the publicly accessible Public Garden.</li> <li>• The Women's Building complements existing uses and the character of the area, and avoids adverse impacts on the amenity of surrounding uses.</li> </ul>
<b>Chapter 5 - Employment</b>			
<b>DM5.1</b>	<b>New Business Floorspace</b>	<p>A)</p> <p>B)</p> <p>C) Outside Employment Growth Areas, Town Centres and the Vale Royal/Brewery Road Locally Significant Industrial Site, business floorspace may be provided within mixed use developments where this would enhance the character and vitality of the local area, would not detrimentally impact on residential amenity, and would not compromise residential growth.</p> <p>D)</p> <p>E)</p> <p>F) New business floorspace must be designed to:</p> <ol style="list-style-type: none"> <li>i. allow for future flexibility for a range of uses, including future subdivision and / or amalgamation for a range of business accommodation, particularly for small businesses, and</li> </ol>	<p>Part A, B, D and E of this Policy are not relevant to the development.</p> <p>The development provides 1,822sqm of flexible commercial floorspace (Use Class E) located to the lower and upper ground floors of Plot B fronting Parkhurst Road, and the ground floor of Plot C fronting the Public Garden. The commercial floorspace is split across a range of unit sizes.</p>

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
		ii. provide full separation of business and residential floorspace, where forming part of a mixed use residential development.	
DM5.2	Loss of Existing Business Floorspace	The development does not involve the loss of any existing business floorspace, therefore this Policy is not relevant to the proposals.	
DM5.3	Vale Royal/Brewery Road Locally Significant Industrial Site	This Site is not located within the Vale Royal/Brewery Road Locally Significant Industrial Site; therefore, this policy is not relevant to the proposals.	
DM5.4	Size and Affordability of Workspace	No affordable workspace is provided as part of the development, therefore this policy is not relevant to the proposals.	
<b>Chapter 6 – Health and Open Space</b>			
DM6.1	Healthy Development	<p>A) Developments are required to provide healthy environments, reduce environmental stresses, facilitate physical activity and promote mental well-being. Large developments, and developments where potential health issues are identified, are required to submit a Health Impact Assessment (HIA) in line with guidance established by the council, to enhance health benefits and mitigate any identified impacts on the wider determinants of health; this may involve planning obligations.</p> <p>B) All major residential developments will be assessed for impacts on additional health services utilisation arising from the development and capacity of existing services. Health services include primary and community care, acute (hospital) facilities and mental health provision. This includes the capital cost of providing the required space and revenue costs of running the necessary services before mainstream NHS funding takes account of the new population. Planning obligations will be negotiated to secure such additional health services from developments in excess of 200 residential units or 10,000m<sup>2</sup> gross, where needs are not adequately addressed through CIL.</p> <p>C) The council will support the provision of new and improved health facilities and their co-location with other community uses, subject to an assessment of the full range of planning considerations.</p> <p>D) Major developments that are open to the public such as shops and leisure uses shall, where appropriate, provide free publicly accessible toilets and drinking water fountains during opening hours.</p>	<p>The planning application is accompanied by a Health Impact Assessment prepared by WSP.</p> <p>Public toilets are not included within the development.</p> <p>An Air Quality Assessment forms part of the submitted Environmental Statement.</p> <p>For the reasons set out in the Noise Chapter of the ES, and the standalone Noise Assessment, the Development will avoid significant adverse noise impacts on health and quality of life, whilst existing noise generating uses will not place unreasonable restrictions or impacts upon the Development..</p> <p>This planning application is accompanied by a series of Contaminated Land Assessments prepared by Waterman.</p>

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
		<p>E) Developments in locations of poor air quality should be designed to mitigate the impact of poor air quality to within acceptable limits. Where adequate mitigation is not provided and/or is not practical planning permission may be refused.</p> <p>F) Developments should not cause significant harm to air quality, cumulatively or individually. Where modelling indicates significant harm would be caused this shall be fully addressed through appropriate mitigation.</p> <p>G) Noise sensitive developments should be adequately separated from major sources of noise, such as road, rail and certain types of development. Noise generating uses should, where possible, be sited away from noise sensitive uses. Where noise generating uses are proposed within a residential area, applicants should demonstrate that the use will not give rise to noise nuisance.</p> <p>H) The council will require adequate treatment of any contaminated land before development can commence.</p>	
<b>DM6.2</b>	<b>New and Improved Public Open Spaces</b>	<p>A) Developments in excess of 200 residential units or 10,000m<sup>2</sup> gross external floorspace, or where a specific need has been identified by the council, are required to provide on-site publicly accessible public open space. This shall be provided in addition to private amenity space and landscaping and shall be fully publicly accessible, without any restrictions and maintained in perpetuity.</p> <p>B) For those development types referred to in Part A above, in exceptional circumstances, where it is clearly demonstrated that public open space cannot be provided on site or that the required amount cannot be provided on site in full, and where the proposal has over-riding planning benefits, a financial contribution shall be paid to the council towards the provision of new public open space or enhancements to existing spaces. Other developments will also create the need for public open space provision and will be expected to provide financial contributions towards this.</p> <p>C) Public open space provision must maximise biodiversity benefits. New or improved public open space shall incorporate areas of biodiversity habitat complementing surrounding habitats and supporting the council's Biodiversity Action Plan. Species chosen for planting across the space must maximise biodiversity benefit. Public open spaces within the functional vicinity of a Site of Importance for Nature Conservation (SINC) shall be planted with native species and local provenance species and complement the species composition in the SINC.</p> <p>D) Public open space should normally be green public open space, such as a public park. Areas of new and/or improved hard landscaped public open space, such as civic space, may be considered appropriate instead of green public open space, particularly in Town Centres. In such cases it must be demonstrated that the provision of green public open space is not possible or appropriate. In relation to Part C of this policy biodiversity benefits should be maximised where appropriate for civic spaces and other hard landscaped public open space.</p>	<p>The development provides 10,480sqm of public open space, formed of the Public Garden (public park), nature garden and Trecastle connection. In accordance with Development Management Policies DPD Policy 6.2 and Draft Local Plan Policy G3, the public open space is provided in addition to private amenity space and landscaping and shall be fully publicly accessible, without any restrictions and maintained in perpetuity. The public open space provision has been considered in the context of the suggested standard of 5.21sqm per resident and 2.6sqm per employee set out in the supporting text to the adopted and draft policies, as set out in the table below. Based on the suggested standard, between 11,616.507 sqm to 12,196.307 sqm of public open space would be sought. This is expressed as a range given the employment generation could vary within the flexible Class E commercial space and within the Women's Building and reflects the minimum and maximum estimated job creation for the scheme. The development provides 10,480sqm of public open space, which equates to between 85.9% and 90.2% of the suggested standard taking into account the quantum of residents and the minimum and maximum estimated job creation. In addition, the development provides further open space which will be publicly accessible along the Camden/Parkhurst Road frontage. This area</p>



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		<p>E) The temporary use of sites for public open space, sport and recreation and/or nature conservation should be considered.</p> <p><u>Supporting Text:</u> Given the pressures on public open space within the borough and population increases, additional public open space should be provided in new development based on the following standards: 5.21m<sup>2</sup> per resident and 2.6m<sup>2</sup> per employee.</p>	<p>comprises 1,463 sqm and will include new street trees, cycle parking, ecological planting, spill-out spaces and seating. When considered alongside the above spaces, the development totals 11,943sqm, which equates to between 97.9% to 102.8% of the suggested standard. The development is considered to provide an appropriate quantum of public open space, taking into account other policy requirements, the need to ensure best use of the land and the wider public benefits the development delivers including the significant provision of housing and affordable housing. A net gain in biodiversity is also secured.</p>
<b>DM6.3</b>	<b>Protecting Open Space</b>	The existing site does not comprise any existing public open space, play space or a designated SINC. Therefore this Policy is not relevant to the proposals	
<b>DM6.4</b>	<b>Sport and Recreation</b>	<p>A) Developments in excess of 200 residential units or 10,000 m<sup>2</sup> gross external floorspace, or where a specific need has been identified by the council, are required to provide new sport and recreation facilities, subject to consideration of any impact on the amenity of land uses within the vicinity of the development. In exceptional circumstances, where there are over-riding merits to the proposal and it is not possible to provide such facilities on site, a financial contribution shall be required to invest in off-site facilities. Other developments will also create the need for sport and recreation provision and will be expected to provide financial contributions towards this.</p> <p>B)</p> <p>C)</p>	<p>The Council has not sought specific new sport and recreation facilities on the Site. The development includes public open space including public park which will be fully accessible to future occupants of the Development as well as the wider community. The public open space will include play space for all age groups.</p> <p>Part B and C are not relevant to the development.</p>
<b>DM6.5</b>	<b>Landscaping, trees and biodiversity</b>	<p>A) Developments must protect, contribute to and enhance the landscape, biodiversity value and growing conditions of the development site and surrounding area, including protecting connectivity between habitats. Developments are required to maximise the provision of soft landscaping, including trees, shrubs and other vegetation, and maximise biodiversity benefits, including through the incorporation of wildlife habitats that complement surrounding habitats and support the council's Biodiversity Action Plan.</p> <p>B) Trees, shrubs and other vegetation of landscape and/or environmental significance must be considered holistically as part of the landscape plan. The following requirements shall be adhered to:</p> <p>i. Developments are required to minimise any impacts on trees, shrubs and other significant vegetation. Any loss of or damage to trees, or adverse effects on their growing conditions, will only be permitted where there are over-riding planning benefits, must be agreed with the council and suitably reprovided. Developments within proximity of existing trees are required to provide protection from any</p>	<p>The planning application is accompanied by an Ecology Assessment included within the Environmental Statement in order to ensure that the proposals manage impacts on biodiversity. The Ecological Assessment includes a series of recommendations in order to enhance and protect the ecological value of the Site. These recommendations have been incorporated into the proposed landscaping scheme and overall design.</p> <p>Furthermore, the proposed landscaping scheme for the site will deliver a substantial net gain in the number of trees and canopy cover for the site. This includes the planting of 364 new trees. A net gain in biodiversity is secured.</p>



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		<p>damage during development. Where on-site re-provision is not possible, a financial contribution of the full cost of appropriate re-provision will be required.</p> <p>ii. The council will refuse permission or consent for the removal of protected trees (TPO trees, and trees within a conservation area) and for proposals that would have a detrimental impact on the health of protected trees.</p> <p>C) Developments should maximise the provision of green roofs and the greening of vertical surfaces as far as reasonably possible, and where this can be achieved in a sustainable manner, without excessive water demand. New-build developments, and all major applications, should use all available roof space for green roofs, subject to other planning considerations.</p> <p>D) The design and operation of green roofs must maximise benefits for biodiversity, sustainable drainage and cooling. Green roofs are required to have a varied substrate depth of average 80-150mm, unless it can be demonstrated that this is not reasonably possible.</p>	<p>The development includes a number of sustainable urban drainage systems including rain gardens and green roofs.</p>
<b>DM6.6</b>	<b>Flood Prevention</b>	<p>A) Applications for major developments creating new floorspace and major Changes of Use that are likely to result in an intensification of water use are required to include details to demonstrate that Sustainable Urban Drainage Systems (SUDS) have been incorporated and meet the following design standards:</p> <p>i. Quantity: schemes must be designed to reduce flows to a 'greenfield rate' of run-off (8 litres/second/hectare for Islington), where feasible. The volume of run-off that must be stored on site should be calculated based on the nationally agreed return period value of a 1 in 100 years flood plus a 30% allowance for climate change for the worst storm duration. Where it is demonstrated that a greenfield run-off rate is not feasible, runoff rates should be minimised as far as possible. The maximum permitted runoff rate will be 50 litres/second/hectare.</p> <p>ii. Quality: the design must follow the SUDS 'management train', maximise source control, provide the relevant number of 'treatment stages' and identify how the 'first flush' will be dealt with.</p> <p>iii. Amenity and biodiversity: the design must maximise amenity and biodiversity benefits, while ensuring flow and volumes of run-off entering open space are predictable and water at the surface is clean and safe. Schemes should maximise areas of landscaping and/or other permeable surfaces to support this.</p> <p>B) Sites located in Local Flood Risk Zones (LFRZs) will be required to submit a Flood Risk Assessment (FRA) to assess the risk of flooding, particularly surface water flooding, taking climate change projections into account. Where the FRA indicates that an additional volume of run-off must be stored above and beyond the amount calculated based on the method above, this must be provided on site.</p> <p>C) All minor new build developments of one unit or more are required to reduce existing run-off levels as far as possible, and as a minimum maintain existing run-off levels, including through the incorporation of SUDS.</p>	<p>The planning application is accompanied by a Flood Risk Assessment (FRA) prepared by Waterman. This confirms that the Site is located in Flood Zone 1 (low risk) and the development will not lead to increased flood risk elsewhere.</p> <p>The development includes significant regrading of land levels and the use of Sustainable Urban Drainage Systems including permeable paving, green roofs and rain gardens which will be fully incorporated into the landscaping design. Further detail are provided in the Open Space and Recreation Assessment and Landscape Design Strategy. The development has followed the drainage hierarchy and runoff from the Site is proposed to be restricted to greenfield rates for all events up to and including the 1 in 100 year rainfall event in line with planning policy.</p>

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		D) Developments may be required to make contributions to addressing surface water flood risk, particularly where they are located in areas considered at high risk of surface water flooding and in exceptional cases where the SUDS quantity standards cannot be achieved on site.	
<b>Chapter 7 – Energy and Environmental Standards</b>			
<b>DM7.1</b>	<b>Sustainable design and Construction</b>	<p>A) Development proposals are required to integrate best practice sustainable design standards (as set out in the Environmental Design SPD), during design, construction and operation of the development.</p> <p>B) The council will support the development of renewable energy technologies in principle, subject to meeting wider policy requirements, including on design (Policy DM2.1 and Policy DM2.3) and air quality (Policy DM6.1). Further guidance on renewable energy technologies is provided in the Environmental Design SPD.</p> <p>C) Major developments, minor developments creating new residential and/or commercial units, and extensions of 100m<sup>2</sup> or greater, shall be accompanied by a Sustainable Design and Construction Statement (SDCS), including where relevant an Energy Statement. The SDCS shall clearly set out how the application complies with relevant sustainable design and construction policies and guidance.</p> <p>D) Applications for those types of development not covered by Part C of this policy shall include details of sustainable design and construction considerations to a level of detail appropriate to the development.</p> <p>E) Applications for major developments are required to include a Green Performance Plan (GPP) detailing measurable outputs for the occupied building, particularly for energy consumption, CO<sub>2</sub> emissions and water use, and should set out arrangements for monitoring the progress of the plan over the first years of occupancy.</p> <p>F) Developers are required to support monitoring of the implementation of the SDCS, GPP and/or other submitted details of sustainable design and construction considerations, by allowing council officers access to the development and submitting information to the council when requested.</p>	The application is accompanied by a Sustainable Design and Construction Statement which responds to Policy DM7.1.
<b>DM7.2</b>	<b>Energy efficiency and carbon reduction in minor schemes</b>	The Development is considered to be Major Development; therefore, this policy is not relevant to this application.	
<b>DM7.3</b>	<b>Decentralised Energy Networks</b>	<p>A) All major developments are required to be designed to be able to connect to a Decentralised Energy Network (DEN). Minor new-build developments should be designed to be able to connect wherever reasonably possible.</p> <p>B) Major developments located within 500 metres of an existing DEN, and minor new-build developments located within 100 metres, will be required to connect to that network, including provision of the means to connect to that network and a reasonable</p>	<p>There are no existing or planned networks within 500m of the Site.</p> <p>The Holloway Prison Site SPD states the heating network should explore opportunities to share heat with neighbouring buildings through providing</p>

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		<p>financial contribution to the connection charge, unless a feasibility assessment demonstrates that connection is not reasonably possible.</p> <p>C) Major developments located within 500 metres of a planned future DEN, which is considered by the council likely to be operational within 3 years of a grant of planning permission, will be required to provide a means to connect to that network and developers shall provide a reasonable financial contribution for the future cost of connection and a commitment to connect via a legal agreement or contract, unless a feasibility assessment demonstrates that connection is not reasonably possible.</p> <p>D) Where connection to an existing or future DEN is not possible, major developments should develop and/or connect to a Shared Heating Network (SHN) linking neighbouring developments and/or existing buildings, unless it can be demonstrated that this is not reasonably possible.</p> <p>E) Where connection to an existing or future DEN is deemed possible under the above policy, major developments are required to detail a preferred energy strategy and an alternative energy strategy within their Energy Statements. The preferred energy strategy shall be based on connection to a DEN and shall be enacted, unless it is not reasonably possible to connect to a DEN, in which case the alternative energy strategy shall be enacted.</p> <p>F) The council will support the development of decentralised energy networks and energy centres in principle, subject to meeting wider policy requirements, including on design (Policy DM2.1 and Policy DM2.3) and air quality (Policy DM6.1).</p>	<p>additional capacity as well as potential connection to DE networks in the wider area (including the Holloway Road and Highbury West clusters). Notwithstanding this, the development does include a connection to a future district heat network.</p> <p>LBI identified a series of neighbouring developments during the course of pre-application discussions. These developments were reviewed by the consultant team and it was determined that it is not reasonably possible to develop and/or connect to a Shared Heating Network (SHN) linking to any of these developments to the Site. Further detail regarding the review is set out in the Sustainable Design and Construction Statement which accompanies the application.</p> <p>Therefore, it is not considered to be reasonable for the Holloway Prison Site to deliver a Shared Heating Network.</p>
<b>DM7.4</b>	<b>Sustainable Design Standards</b>	<p>A) Major new-build residential developments are required to achieve the following standards under the Code for Sustainable Homes, or equivalent:</p> <ul style="list-style-type: none"> <li>i. up to 2016 – Level 4</li> <li>ii. 2016 onwards – Level 5</li> </ul> <p>B) Minor new-build residential developments are required to achieve Code for Sustainable Homes Level 4.</p> <p>C) Major residential developments consisting of the refurbishment of existing buildings, including the conversion of existing buildings to form flats, are required to achieve EcoHomes Excellent, or equivalent.</p> <p>D) Major non-residential developments are required to achieve Excellent under the relevant BREEAM or equivalent scheme and make reasonable endeavours to achieve Outstanding.</p> <p>E) Major developments are required to score a minimum number of BREEAM / Code for Sustainable Homes credits on materials and waste (see paragraph 7.21 below). As a minimum, 10% of the total value of materials used should derive from recycled and reused content in the products and materials selected.</p> <p>F) All developments are required to comply with Islington’s Code of Practice for Construction Sites.</p>	<p>This application is accompanied by a Sustainable Design and Construction Statement, including a BREEAM Pre-Assessment, prepared by Hoare Lea which responds to Policy DM7.4.</p>

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		G) Non-residential major developments, non-residential new-build minor developments of one unit or more, and non-residential extensions of 100m <sup>2</sup> or greater, are required to demonstrate how they would achieve all credits for water efficiency in the relevant BREEAM scheme. Where it is demonstrated that this is not reasonably possible, developments (subject to the above exclusions) are required to achieve at least 2 credits for water efficiency in the relevant BREEAM scheme.	
<b>DM7.5</b>	<b>Heating and Cooling</b>	<p>A) Developments (excluding householder extensions) are required to demonstrate how the proposed design has maximised incorporation of passive design measures to control heat gain and to deliver passive cooling, following the sequential cooling hierarchy, below:</p> <ol style="list-style-type: none"> <li>1. (Highest priority) Passive design to minimise unwanted heat gain and manage heat (e.g. orientation, shading, fenestration, soft landscaping, thermal mass, energy efficient lighting and appliances)</li> <li>2. Passive/natural cooling (e.g. cross ventilation, passive stack ventilation, night purging)</li> <li>3. Mixed-mode cooling, with local mechanical ventilation / cooling provided where required to supplement the above measures using (in order of preference) low energy mechanical cooling followed by air conditioning</li> <li>4. Full-building mechanical ventilation / cooling systems using (in order of preference) low energy mechanical cooling followed by air conditioning</li> </ol> <p>B) Measures at the highest priority level of the above cooling hierarchy shall be utilised to the fullest extent possible before the next level of the hierarchy is utilised. Use of technologies from lower levels of the hierarchy shall not be supported unless evidence is provided to demonstrate that technologies from higher levels of the hierarchy cannot deliver sufficient heat control.</p> <p>C) Applications for major developments are required to include details of internal temperature modelling under projected increased future summer temperatures to demonstrate that the risk of overheating has been addressed.</p>	The development has been designed to reduce urban heat island impacts through design, layout, orientation, material and green infrastructure. Internal overheating and a reduced reliance upon air conditioning systems is detailed in the submitted Sustainable Design and Construction Statement.
<b>Chapter 8 - Transport</b>			
<b>DM8.1</b>	<b>Movement hierarchy</b>	The design of developments, including building design and internal layout, site layout, public realm and the provision of transport infrastructure, is required to prioritise the transport needs of pedestrians, public transport users and cyclists above those of motor vehicles.	The development has been designed to maximise the potential for sustainable travel through the delivery of a 'car-free' development, thus minimising the impact upon the local transport network and prioritising pedestrians, public transport users and cyclists.
<b>DM8.2</b>	<b>Managing Transport impacts</b>	A) Development proposals are required to meet the transport needs of the development and address its transport impacts in a sustainable manner and in accordance with best practice. Where the council considers that a development is likely to have a significant negative impact on the operation of transport infrastructure, this impact must be satisfactorily mitigated. In order for developments to be considered acceptable they are required to:	The development is car-free apart from the provision of limited disabled parking. The Site is highly accessible by non-car modes of travel, including on foot, by cycle and by public transport, and the Site has a PTAL score of 6a ('excellent'). The development seeks to create an attractive public realm, with new access points to the

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		<ul style="list-style-type: none"> <li>i. fully mitigate any adverse impacts upon the capacity of transport infrastructure, including pavements and other walking routes, cycle routes, public transport and roads;</li> <li>ii. have no negative impacts on the safe and efficient operation of transport infrastructure;</li> <li>iii. maximise safe, convenient and inclusive accessibility to, from and within developments for pedestrians, cyclists and public transport users;</li> <li>iv. provide equal access for all people, including inclusive access for disabled people;</li> <li>v. adequately address delivery, servicing and drop-off requirements, and</li> <li>vi. have no significant negative impacts from transport arrangements on the local and wider environment.</li> </ul> <p>B) Development proposals are required to include the submission of either a Transport Assessment and Travel Plan, or a Transport Statement and Local Level Travel Plan, in accordance with the thresholds outlined in Appendix 5 and any subsequent update to these thresholds. The submitted information is required to be sufficiently detailed and accurate to enable the council to fully assess the development proposal. Construction Logistics Plans and Delivery and Servicing Plans may be required for developments where there may be an impact on roads. These plans should demonstrate how any potential impacts will be mitigated.</p>	<p>Site, as well as improvements to the pedestrian crossing on Parkhurst Road / Camden Road.</p> <p>This application is accompanied by a Transport Assessment, Travel Plan, Delivery and Servicing Plan and Construction Environmental Management Plan. These documents meet the requirements of Part B of this policy.</p>
<b>DM8.3</b>	<b>Public Transport</b>	The Development does not include public transport proposals therefore this policy is not relevant to this application.	
<b>DM8.4</b>	<b>Walking and Cycling</b>	<p>A) Where public realm works are required as part of development, these shall be undertaken to best practice standards, meeting the objectives contained in Islington's Streetbook SPD and having regard to the guidance contained in the Mayor's Better Streets (2010) and English Heritage's Streets for All documents.</p> <p>B) Major development proposals are required to contribute financially to strategic improvements to walking and cycling infrastructure, including the borough cycle network set out in Appendix 6, the London Cycle Hire Scheme, Cycle Superhighways and wayfinding boards. Contributions shall be made through the use of CIL and/or Section 106 legal agreements, as appropriate.</p> <p>C) Major developments, minor developments creating new residential and/or commercial units, and extensions of 100m<sup>2</sup> or greater, are required to provide cycle parking in accordance with the minimum standards set out in Appendix 6. Cycle parking is required to be designed to best practice standards and shall be secure, sheltered, integrated, conveniently located, adequately lit, step-free and accessible. Cycle parking shall include an adequate element of parking suitable for accessible bicycles and tricycles. Residential cycle parking is required to include provision for cycle parking for family use.</p> <p>D) Major developments, minor developments creating new residential and/or commercial units, and extensions of 100m<sup>2</sup> or greater are required to provide end-of-trip facilities</p>	<p>The proposals seek to connect to the existing and proposed cycle routes within the vicinity of the Site. In addition, the development includes a number of public realm improvements, such as creating new access points to the Site and car-free routes through the Site, which will enhance connectivity, permeability and environment for cyclists.</p> <p>The development will provide cycle parking provision for all uses in line with the standards required in the London Plan and includes provision for larger cycles, including adapted cycles for disabled people. The cycle parking proposed will be designed and laid out in accordance with the London Cycling Design Standards.</p> <p>For the residential element, 80 per cent of cycle parking is two-tier cycle parking whilst 20 per cent is accessible cycle parking for people with non-standard bicycles and those that struggle to use two-tier systems. Of these, 75</p>

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		<p>for cyclists in accordance with best practice. End-of-trip facilities are required to be provided at a level proportionate to the size of the development and the required level of cycle parking.</p> <p>E) Proposals for uses that are publicly accessible are required to contribute financially to publicly-accessible cycle parking located in the public realm within the vicinity of the site. Publicly accessible uses include, but are not limited to, uses within the A1 (shops), A2 (financial and professional services), A3 (restaurants and cafés), D1 (non-residential institutions) and D2 (assembly and leisure) Use Classes. This provision shall be secured by a Section 106 legal agreement or CIL, as appropriate.</p> <p>F) It must be demonstrated that there are no road safety conflicts between pedestrians, cyclists and vehicles entering, parking and servicing a development. Cyclist entrances must be safe and convenient. Separate cycle lanes should be demarcated.</p>	<p>per cent will be Sheffield stands and 25 per cent will be Sheffield stands with increased space (i.e. for cargo bikes, hand cranked bikes, trailers, buggies, tandems and tricycles). The accessible cycle parking spaces will be conveniently located to the building entrances. The short stay cycle parking for all uses will be provided within the public realm in the form of Sheffield stands. Further detail of the specification of racks and access will be included within the Transport Assessment which accompanies the planning application.</p>
<b>DM8.5</b>	<b>Vehicle Parking</b>	<p>A. Residential Parking (Use Class C3) Applications for vehicle parking within the curtilage of existing residential properties will be refused. No provision for vehicle parking or waiting will be allowed for new homes, except for essential drop-off and wheelchair-accessible parking. In line with the Core Strategy, all additional homes will be car free. Unless exceptional circumstances can be demonstrated, no parking permits will be issued to occupiers of these new homes.</p> <p>B. Non-residential parking (for all uses not falling within Use Class C3)</p> <p>i. Parking will only be allowed for non-residential developments where this is essential for operational requirements and therefore integral to the nature of the business or service (e.g. car hire, Use Class B8 storage and distribution uses). In such cases, parking will only be permitted where an essential need has been demonstrated to the satisfaction of the council and where the provision of parking would not conflict with other council policies. Normal staff parking will not be considered essential and will not be permitted.</p> <p>ii. Any permitted parking is required to be off-street and located to be accessible and convenient in relation to the development and to provide an accessible route from the parking space to the development. Where on-street drop-off, wheelchair accessible parking or other essential parking is proposed details must be submitted to demonstrate the need for on-street provision and to show that arrangements will be safe and will not cause a traffic obstruction or nuisance.</p> <p>iii. Planning applications for uses that require coach parking ancillary to another use will not be permitted where the coach parking would give rise to adverse impacts on road safety and congestion. Coach parking should be provided on-site, unless the applicant can identify an alternative location which satisfies the council in terms of road safety and congestion and other relevant planning matters.</p> <p>iv. Planning applications for commercial developments where ongoing use of a vehicle fleet will be required during the operational phase of the development (such as minicab offices, delivery restaurants and couriers) will only be approved if the</p>	<p>Given the Site's highly accessible location, the development will be car-free apart 30 disabled parking spaces for Blue Badge holders which will be provided on site, as on-street parking along the internal road.</p> <p>As set out within the Transport Assessment, a Transport Classification of Londoners (TCoL) demographic assessment has been undertaken for the development which suggests the future residents are most likely to comprise 'students and graduates', 'educational advantage' and 'urban mobility', each of which has a 'well below average' or 'below average' car use. Moreover, an assessment of valid Blue Badge permits within the borough has been undertaken, which confirmed that 3.2% of the population had permits within LBI. However, this does not take into consideration the likely demographic of the development. As such, it is considered that the proposed 3% disabled car parking space provision is suitable for the development in this location, given the highly accessible nature of the Site and the likely future demographic. The level of Blue Badge car parking proposed has been agreed with TfL.</p> <p>With respect to additional parking spaces, to provide up to 10% of residential units with a Blue Badge parking space, Peabody has agreed to a financial contribution</p>



Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
		<p>applicant can demonstrate that the transport impacts of the development have been satisfactorily mitigated. Only the minimum necessary provision shall be permitted in the above circumstances.</p> <p>C. Wheelchair – accessible parking Wheelchair-accessible car parking is required to be provided in accordance with best practice standards, as set out in the council's Planning Obligations SPD and Accessible Housing SPD, and BS8300:2009. Developments are also required to provide adequate provision for mobility scooter storage and charging. The council will require accessible parking bays to be located on-street where practical; such spaces should be identified and the cost of provision secured by a Section 106 legal agreement to enable the council to install the accessible parking spaces.</p> <p>D. Car Clubs The council will support the provision of car clubs, including the provision of wheelchair accessible car club parking bays, where appropriate. Major residential developments will be required to contribute towards the provision of car clubs in the vicinity of the development, through CIL and/or Section 106, as appropriate.</p> <p>E. Public Car Parks Proposals for, or including, new public car parks (and other motor vehicle public parking, including for coaches) will be refused. Proposals for the redevelopment of existing car parks for a different use shall be subject to the car-free restriction within this policy and the Core Strategy.</p>	<p>of £2,000 per space not provided on-site. This accords with LBI's Planning Obligations (Section 106) SPD (2016).</p>
<b>DM8.6</b>	<b>Delivery and servicing for New Developments</b>	<p>A) Provision for delivery and servicing should be provided off-street, particularly for commercial developments over 200m<sup>2</sup> gross floor area. In order to ensure proposed delivery and servicing arrangements are acceptable:</p> <ul style="list-style-type: none"> <li>i. It must be demonstrated that servicing and delivery vehicles can enter and exit the site in forward gear.</li> <li>ii. Details shall be submitted to establish the delivery and servicing needs of developments</li> <li>iii. Delivery and servicing bays are required to be strictly controlled, clearly signed and only used for the specific agreed purpose.</li> </ul> <p>B) Where on-street servicing is proposed details must be submitted to demonstrate the need for on-street provision and that off-street provision is not practical, and to show that arrangements will be safe and will not cause a traffic obstruction or nuisance. Traffic modelling may be required.</p> <p>C) For major developments, details of refuse and recycling collection must be submitted, indicating locations for collection vehicles to wait and locations of refuse and recycling bin stores. Applications for larger residential developments must demonstrate that delivery and servicing would not impact negatively on refuse collection arrangements.</p>	<p>The development seeks to facilitate safe, clean and efficient deliveries and servicing. Appropriate servicing provision is provided across the development. Further detail is set out in the Transport Assessment, Delivery and Servicing Plan and Waste Management Plan.</p>

Policy	Policy Title	LBI Development Management Policies (2013)	Assessment
		D) It must be demonstrated that worst case scenarios have been assessed and their impacts mitigated, in terms of delivery and servicing. It may be required to demonstrate such scenarios in TRAVL (Trip Rate Assessment Valid for London).	
<b>Chapter 9 - Infrastructure and Implementation</b>			
<b>DM9.1</b>	<b>Infrastructure</b>	A) To ensure development is sustainable planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the council's Community Infrastructure Levy (CIL).	The development will contribute towards infrastructure through a CIL contribution and s106 obligations where relevant.
		B) Planning obligations may be used to secure infrastructure where a development has infrastructure needs that are not addressed through CIL, or that are not fully addressed through CIL. The council will require additional infrastructure needs to be met by planning obligations secured through a Section 106 legal agreement.	
		C) Where it is necessary for CIL chargeable development to also enter into a Section 106 agreement to secure planning obligations, CIL payments will be taken into account when determining the required level of planning obligations.	
<b>DM9.2</b>	<b>Planning Obligations</b>	Planning obligations will be used by the council to deliver sustainable development. This may include (but is not limited to) compensation for loss or damage associated with a development, mitigation of the impacts of a development, prescription of the nature of a development, and other measures to make a development acceptable in planning terms, where possible and appropriate, in accordance with the Community Infrastructure Levy Regulations.	The development will contribute towards infrastructure through a CIL contribution and s106 obligations where relevant.
<b>DM9.3</b>	<b>Implementation</b>	This Policy concerns the decisions of the Council, therefore is not relevant to the development to be assessed against.	



### 3. Assessment against LBI Draft Local Plan (2019, as modified 2021)

Policy	Policy Title	LBI Draft Local Plan	Assessment
<b>Delivering the Local Plan vision and objectives</b>			
<b>PLAN 1</b>	<b>Site appraisal, design principles and process</b>	A) All forms of development are required to be of a high quality and make a positive contribution to local character, legibility and distinctiveness, based upon an up-to-date understanding and evaluation of the defining characteristics of an area. Any development which does not take the opportunities available for improving the character and quality of an area and the way it functions will be refused.	The development is of a high quality and makes a positive contribution to local character, legibility and distinctiveness. The Design and Access Statement includes an evaluation of the defining characteristics of the local area and sets out how the development contributes towards this.
		<p>B) To ensure that the vision and objectives of the Local Plan are realised, all development in Islington must, from the very first iteration of the proposal, comply with four key design principles:</p> <ul style="list-style-type: none"> <li>i. Contextual – all development must make efficient use of sites/buildings, by responding to and enhancing the existing site context (which could extend beyond the site itself); not undermining the quality of existing development and streetscape; and ensuring that the development capacity of site is fully realised. A good level of amenity must be provided, including consideration of noise and the impact of disturbance, hours of operation, vibration, pollution (such as air, light and noise), fumes between and within developments, overshadowing, overlooking, privacy, direct sunlight and daylight, over-dominance, sense of enclosure and outlook.</li> <li>ii. Connected – development must improve permeability and movement through areas and the quality, clarity and sense of spaces around and between buildings. All opportunities to repair fragmented urban form should be taken. Proposals must improve safety and promote positive social contact, behaviours and community cohesion, including through creation or enhancement of effective places to dwell, and through increased natural surveillance. Development must sustain and reinforce a variety and mix of uses in line with any relevant land use priorities of the Local Plan. No proposal should unduly prejudice the satisfactory development or operation of adjoining land and/or the development of the surrounding area as a whole.</li> <li>iii. Inclusive – development must be adaptable, functional and resilient, and able to respond to the spatial, social and economic needs of the borough’s increasingly diverse communities and their different and evolving demands. This includes sustaining and reinforcing a variety and mix of uses in line with any relevant land use priorities of the Local Plan.</li> <li>iv. Sustainable – development must be durable and adaptable, and contribute to the creation of a vibrant, liveable, enduring city. All development must consider social, environmental and economic elements jointly and simultaneously, guiding development towards sustainable solutions.</li> </ul>	<p>The Development complies with the four key design principles set out in Part B of Policy PLAN1:</p> <ul style="list-style-type: none"> <li>i. The development makes the most efficient use of the Site by responding to and enhancing the existing site context, whilst also ensuring that a good level of amenity is provided for existing and future residents. The planning application is accompanied by a suite of technical documents which provide detail of how this is achieved.</li> <li>ii. The development improves permeability and movement through the Site and surrounding area by creating new links, including the connection to Trecastle Way. The development approach has been based on connecting to the wider landscape, reducing cars and prioritising people, creating a place for people and using ecology to define spatial types.</li> <li>iii. The development has been designed in accordance with the principles of inclusive development and is adaptable, functional and resilient.</li> <li>iv. The Development achieves high levels of sustainable development and has been designed to be durable and adaptable.</li> </ul>

Policy	Policy Title	LBI Draft Local Plan	Assessment
		<p>C) The process of developing and designing a proposal which addresses the four key design principles will only be effective where it is informed by a comprehensive site appraisal. All development proposals must submit a site appraisal comprising the information below, commensurate with the scale, location and potential impact of the proposal; major developments and smaller developments on sites in prominent or sensitive locations will likely be required to address many, if not all, of the criteria. Information must be demonstrated/evidenced through provision of detailed clear and accurate drawings and relevant written statements:</p> <ul style="list-style-type: none"> <li>i. architectural and design quality and detailing, such as colour, type, source and texture of detailing and materials used. Construction detailing must be unified, visually attractive, robust and maintenance free; poorly-detailed and undeliverable built forms are not appropriate;</li> <li>ii. details of historic context, such as distinctive local built form, significance and character of any designated and non-designated heritage assets, scale and details that contribute to its character as a place;</li> <li>iii. an assessment of the urban form, such as building lines, frontages, plot sizes and patterns, building heights, storey heights and massing;</li> <li>iv. movement and spatial patterns, such as definition, scale, use, detailing and surface treatment of routes and spaces;</li> <li>v. considerations of the local landscape and natural features, such as topography, trees, boundary treatments, planting and biodiversity; this must be informed by appropriate information including, where relevant, a tree survey and analysis of the local ecology and green links;</li> <li>vi. visual context, particularly strategic, local and other site specific views (e.g. local landmarks), skylines and silhouettes, and scale and form of townscape set pieces or urban compositions;</li> <li>vii. daylight and sunlight levels, based on relevant best practice/guidance;</li> <li>viii. surface water flows and opportunities to capture them;</li> <li>ix. existing features and patterns of use including housing, entertainment, commercial, community and play activities;</li> <li>x. details of infrastructure provision, including existing and planned infrastructure, and any impacts that the development will have on this existing and/or planned provision;</li> <li>xi. the accessibility (physical, social, and economic) of the street in context; including technical survey information and feedback on user experience of the street;</li> <li>xii. safety in design, including consideration of access, materials and site management strategies;</li> <li>xiii. plan(s) showing the location of utilities above and below ground, and, where proposals may impact on ongoing operation of utilities, evidence of engagement with relevant utilities providers;</li> </ul>	<p>A site assessment is included within the Design and Access Statement which supports this planning application to provide detail of existing site characteristics, opportunities and constraints.</p>

Policy	Policy Title	LBI Draft Local Plan	Assessment
		<p>xiv.traffic, including pedestrian flows at different times of the day and week, and an analysis of what modal shift might be possible; and</p> <p>xv. assessment of route and place qualities.</p>	
		D) All elements of proposed building designs must be demonstrably deliverable. Any proposals which are considered likely to employ 'value engineering' approaches, which dilute the design quality of approved schemes and often make schemes difficult to maintain, will be resisted.	The Design and Access Statement demonstrates that the building design is deliverable.
<b>Chapter 2 - Spatial Strategy</b>			
<b>SP1</b>	<b>Bunhill and Clerkenwell</b>	This draft policy is not relevant to the development.	
<b>SP2</b>	<b>King's Cross and Pentonville Road</b>	This draft policy is not relevant to the development.	
<b>SP3</b>	<b>Vale Royal/ Brewery Road Locally Significant Industrial Site</b>	This draft policy is not relevant to the development.	
<b>SP4</b>	<b>Angel and Upper Street</b>	This draft policy is not relevant to the development.	
<b>SP5</b>	<b>Nag's Head and Holloway</b>	<p>A)</p> <p>B)</p> <p>C)</p> <p>D)</p> <p>E) The Holloway Prison site is the key local housing site which will help to meet identified housing need in the borough. The site will provide, inter alia, high levels of genuinely affordable housing, community uses including a women's building/centre and publicly accessible green open space.</p> <p>F)</p> <p>G)</p> <p>H)</p> <p>I)</p> <p>J)</p> <p>K)</p>	<p>Part A to D, F to K, and M of this Policy are not relevant to the development.</p> <p>Part E of Policy SP5 relates to the Holloway Prison site and identifies this as a key local housing site which will help to meet identified housing need in the borough. In accordance with this, the development comprises 985 new homes, 60% of which are affordable. This is a significant contribution to the Council's housing supply. The development also includes a Women's Building and publicly accessible open space.</p>

Policy	Policy Title	LBI Draft Local Plan	Assessment
		L) The heritage assets of the area will be protected and enhanced where specific proposals come forward. The key listed buildings are the Holloway Odeon cinema and 458-462 Holloway Road. Other notable buildings include the former Jones Brothers tower and 67-83 Seven Sisters Road.	The planning application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment which considers the impact of the development on heritage assets.
		M)	
SP6	Finsbury Park	This draft policy is not relevant to the development.	
SP7	Archway	This draft policy is not relevant to the development.	
SP8	Highbury Corner and Lower Holloway	This draft policy is not relevant to the development.	
<b>Chapter 3 - Thriving Communities</b>			
H1	Thriving Communities	A) Islington should continue to be a place where people of different incomes, tenures and backgrounds can live in mixed and balanced communities which are economically, environmentally and socially healthy and resilient. All new housing development must be fully integrated within, and relate positively to, its immediate neighbours and locality. Gated development is not suitable, as it isolates and compartmentalises communities.	The development includes 60% affordable housing of differing tenures to help support a mixed and balanced community. The development is not gated.
		B) All new housing must contribute to the delivery of the Local Plan vision and objectives, making the borough a fairer place through the delivery of the right type of housing that meets identified needs.	The mix is considered to provide an appropriate mix of units taking into account housing need, the characterises of the development and the proposed tenures.
		C) Islington support high density housing development. Proposals which include housing must make the most efficient use of land to ensure that the optimal amount of housing is delivered, while having regard to other Development Plan policies and the specific site context. Developments which result in the reduction of land supply which could reasonably be expected to be suitable for conventional housing, and would therefore threaten the ability to meet housing targets, will be refused.	The development has sought to make the best use of brownfield land by following a design-led approach in order to optimise the capacity of the Site.
		D) High quality new homes are integral to achieving the aim of making the most efficient use of land and improving quality of life of residents. Homes should be designed as a place of retreat and as such must contribute to improving the health and wellbeing (both physical and mental health) of residents. New homes must be designed to be adaptable over their lifetime to accommodate changing needs.	The development seeks to provide high quality housing whilst optimising site capacity to make the most efficient use of land. As such, the development has been designed with regard to relevant design guidance.
		E) Delivery of genuinely affordable housing is a key priority of the Local Plan. The overarching strategic target over the plan period is for 50% of all new housing to be genuinely affordable.	The development include the provision of 60% affordable housing.
		F) The affordable housing tenure split on all schemes must prioritise forms of affordable housing which is genuinely affordable for those in need, particularly social rented housing.	The affordable housing includes the following tenure split: <ul style="list-style-type: none"> <li>- 70% Social Rent at Target Rent levels</li> <li>- 30% London Shared Ownership</li> </ul>

Policy	Policy Title	LBI Draft Local Plan	Assessment
		G) Islington will seek affordable housing contributions from small sites (less than 10 net additional units) to fund the development of affordable housing in the borough, including Council-led housing developments.	The development includes the provision of 60% affordable housing.
		H) Islington is committed to meeting and exceeding the boroughs minimum housing delivery target as set out in the London Plan.	The development includes the provision of 985 residential units which seeks to contribute to the minimum housing delivery target as set out within the London Plan.
		I) The Council will maintain a supply of housing land to meet housing targets over the plan period, with a particular focus on demonstrating a five year supply of land. The Council will produce a housing trajectory, which will be published annually as part of the monitoring framework.	This part of the draft policy is not relevant to the proposals.
		J) The size mix of new housing must reflect local need, with priority for units suitable for families.	The housing mix has sought to address local demand which includes the povision of family-sized units. Further details are set out within the Planning Statement and the Affordable Housing Statement.
		K) Conventional residential accommodation must be designed to meet a variety of needs throughout its lifetime. Various forms of specialist housing may be necessary to provide support to specific groups of vulnerable people and those at risk.	The development will deliver 12% M4(3) wheelchair accessible provision by unit number across the scheme. The remaining units will be M4(2).
		L) Housing needs for older people will predominantly be met through conventional housing. In exceptional circumstances, specialist accommodation for vulnerable older people may be required.	The development includes the provision of 60 Extra Care Units to meet the needs of older people.
		M)	This part is not relevant to the proposals.
		N)	This part is not relevant to the proposals.
		O)	This part is not relevant to the proposals.
		P)	This part is not relevant to the proposals.
		Q)	This part is not relevant to the proposals.
		R)	This part is not relevant to the proposals.
		S) Islington will support the retention and development of social and community infrastructure necessary to support the borough's residents, workers and visitors. This infrastructure must be designed to be high quality, appropriate to specific needs and requirements of the use and users; and located in places that are accessible, safe and convenient for people of all ages that use them.	The Development includes the provision of a Women's Building which contributes to the provison of social infrastructure within the borough.
		T) Existing play space will be protected and new play space will be sought as part of development. This should meet the needs of children and young people of all ages and abilities. Provision of incidental play space and the creation of playable environments, as part of building/public realm design, adds a further important element of play.	The development includes 5,292sqm of play space. This provides a stimulating environment with a wide range of opportunities for different age groups and abilities. 100% of the play space is provided at ground and first floor level to make it accessible to all age groups and abilities. This includes a large, public 'destination' play area at the heart of the site

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		<p>U) The health of communities is a very important consideration as part of new development. Health Impact Assessments will be required in order to assess how new development will affect the health of local communities.</p> <p>V) New development in Islington should maximise social value, beyond what the Council would expect as a standard level of social value on a scheme (resulting from compliance with all relevant policy requirements).</p>	<p>for all ages and abilities which will be publicly accessible.</p> <p>The planning application is accompanied by a Health Impact Assessment prepared by WSP.</p> <p>The planning application includes a completed Social Value Self-assessment Form.</p>
<b>H2</b>	<b>New and Existing Conventional Housing</b>	<p>A) Islington aims to meet and exceed the housing target of 7,750 units by 2028/29, which equates to an annualised target of 775 per annum</p> <p>B) Development proposals involving new housing – regardless of site size – must demonstrate that use of the building/site is optimised. Particular consideration must be given to:</p> <ul style="list-style-type: none"> <li>i. the contribution to meeting need for particular types of housing;</li> <li>ii. the contribution to meeting the borough’s housing targets;</li> <li>iii. the level of housing density;</li> <li>iv. social and strategic infrastructure requirements and impacts on existing and/or planned infrastructure; and</li> <li>v. interaction with other policy priorities, including the provision of new business floorspace to meet projected jobs growth and sustainable and inclusive design measures.</li> </ul> <p>C) The loss of existing self-contained housing will be resisted unless the housing is replaced by at least equivalent floorspace and does not involve the net loss of more than one unit. The net loss of existing affordable housing units – overall and in terms of social rented housing – will not be permitted. Conversion of two or more units into a single dwelling is considered material and would require planning permission.</p> <p>D) All development proposals for conventional residential dwellings (including conversions and extensions) must provide a good mix of unit sizes which contributes to meeting the housing size mix priorities set out in Table 3.2.</p> <p>E) Concentrations of one-bedroom units – overall and as part of constituent market and affordable elements of a proposal – will not be acceptable.</p>	<p>The development includes the provision of 985 residential units which seeks to contribute to Islington’s housing delivery target.</p> <p>The development proposals have sought to make the best use of brownfield land by following a design-led approach in order to optimise the capacity of the Site.</p> <p>The development has sought to deliver a good mix of unit sizes to meet to contribute to the housing size mix priorities set out in Table 3.2, with the inclusion of family-sized units.</p> <p>With respect to Part H, we are of the opinion that this obligation cannot be enforced and therefore does not meet the relevant tests set out in Regulation 122 of the CIL Regulations (2010, as amended). On this basis, we do not consider this should be applied to the development.</p>

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		<p>F) Studio and bedsit units will not be permitted unless all of the following exceptional circumstances are demonstrated:</p> <ul style="list-style-type: none"> <li>i. Studios/bedsits would constitute a very small proportion of the housing mix of a development proposal, both overall and/or in any constituent market or affordable elements;</li> <li>ii. The delivery of additional higher priority unit sizes and/or proposed higher priority units of an increased size is not possible; and</li> <li>iii. Provision of studios/bedsits would result in a high quality dwelling in accordance with Policy H4 and other relevant design policies.</li> </ul> <p>G) To maintain a supply of family homes, the conversion of residential units into a larger number of self-contained units will only be permitted where:</p> <ul style="list-style-type: none"> <li>i. The total floor area of the existing dwelling is in excess of 125sqm GIA;</li> <li>ii. The total number of new homes resulting from the conversion is optimised in line with the housing size mix priorities; and</li> <li>iii. The dwelling mix does not contain any studio/bedsit units or more than one one-bedroom unit.</li> </ul> <p>H) All residential developments of 20 units and over are required to enter into a Section 106 legal agreement to ensure that all residential units will be occupied, to prevent wasted housing supply.</p>	
<b>H3</b>	<b>Genuinely Affordable Housing</b>	<p>A) A minimum of 50% of the total net additional conventional housing built in the borough over the plan period must be genuinely affordable. Affordable housing tenures which are not considered to be genuinely affordable will be resisted and will not be counted towards the level of affordable housing provision on individual schemes.</p> <p>B) All sites (except for those which are currently or have been in full or partial public sector ownership) which are capable of delivering 10 or more conventional units (gross) and/or which propose 1,000sqm (GIA) residential floorspace or more must:</p> <ul style="list-style-type: none"> <li>i. provide at least 45% on-site affordable housing (by net additional unit) without public subsidy; and</li> <li>ii. exhaust all potential options for maximising the delivery of on-site affordable housing to reach and exceed the strategic 50% target, particularly through securing public subsidy.</li> </ul> <p>C) Where a site triggers Part B, and proposes a level of on-site affordable housing above 45% but less than 50% (regardless of whether public subsidy is provided or not), the proposal will be subject to detailed review mechanisms throughout the period up to full completion of the development, including an advanced stage review mechanism. Any sites which trigger Part B and provide at least 50% on-site affordable housing (by net additional unit) will not be subject to an advanced stage review mechanism but will be subject to review mechanism which will be triggered if an agreed level of progress on implementation is not made within a certain period following grant of planning permission; and, in the case of large phased schemes, triggered prior to the implementation of later phases of the development.</p>	<p>The Site is public sector land given its previous use as a prison operated on behalf of the Ministry of Justice. The development provides 60% affordable housing (by unit) with a tenure split of 70% social rent, with rent levels set at Target Rent, and 30% London Shared Ownership.</p> <p>The first 50% is provided without grant. The Applicant has sought to maximise affordable housing beyond the minimum required amount of 50% and provides the additional 10% affordable housing utilising grant. This results in a total offer of 60% affordable housing. The affordable housing provision is compliant with London Plan Policy H4, H5 and H6, Core Strategy Policy CS12 and Draft Local Plan Policy H3. The development is eligible for the Fast Track Route. Nevertheless, LBI has requested the Applicant submit a Viability Assessment. In accordance with this request a Viability Assessment is submitted and the Applicant</p>

Policy	Policy Title	LBI Draft Local Plan	Assessment
		<p>D) All sites which are capable of delivering 10 or more conventional units (gross) and/or which propose 1,000sqm (GIA) residential floorspace or more, and which are currently or have been in public sector ownership (either part or full public ownership) must:</p> <ul style="list-style-type: none"> <li>i. provide at least 50% on-site affordable housing (by net additional unit) without public subsidy; and</li> <li>ii. exhaust all potential options for maximising the delivery of on-site affordable housing in excess of 50%, particularly through securing relevant public subsidy.</li> </ul> <p>E) Where a site triggers Part D, and additional on-site affordable housing does not demonstrate 'additionality' above 50% to the Council's satisfaction, the proposal will be subject to detailed review mechanisms throughout the period up to full completion of the development, including an advanced stage review mechanism.</p> <p>F) Any proposal which does not provide the minimum required level of affordable housing set out in Part B or D will be refused.</p> <p>G) Site-specific viability information will only be accepted in exceptional cases, determined by the Council. Any proposals where site-specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence consistent with the Development Viability SPD. Such proposals will be subject to detailed review mechanisms throughout the period up to full completion of the development, including an advanced stage review mechanism.</p> <p>H) Where affordable housing is provided on-site, the Council will require an affordable housing tenure split of 70% social rented housing and 30% intermediate housing. The majority of intermediate units should be London Living Rent, and regard will be given to the priorities set out in the Council's Housing Strategy and other agreed evidence of housing need.</p> <p>I)</p> <p>J)</p>	<p>is happy for this to be made publicly available alongside the other application documents.</p> <p>Part I and J of this Draft Policy are not relevant to the development.</p>
<b>H4</b>	<b>Delivering high quality housing</b>	<p>A) All new C3 and C4 housing developments (including conversions and changes of use) and specialist housing identified in policies H6 to H11 must be designed and built to a high quality for the duration of its lifetime. A high quality dwelling is one which meets the criteria set out in this policy and accords with the Local Plan objectives and other relevant Local Plan policies. Sufficient information, such as detailed dwelling plans showing internal layout, must be provided at the earliest possible stage of an application, to allow for proper assessment of proposals.</p> <p>B) Residential development must be functional, useable and comfortable space that has good amenity for occupiers of all ages. Regard must be had to the surrounding local context as part of the holistic consideration of inclusive design. Housing must be built to be accessible and adaptable to meet changing occupier circumstances over the lifetime of the development, and must provide 90% of dwellings to Category M4(2) 'Accessible and Adaptable' standard; and the remaining 10% of dwellings to Category M4(3) 'Wheelchair user dwellings' standard, as set out in the Approved Document M of the Building Regulations. Category M4(3) standard dwellings must:</p>	<p>The proposals include the provision of 60 self-contained Extra Care Units. The design of the dwellings accord with relevant Local Plan policies, further to this, the plans demonstrate detailed internal layouts of the dwellings.</p> <p>The development will deliver 12% M4(3) wheelchair accessible provision by unit number across the scheme. The remaining units will be M4(2). Wheelchair homes have sought to be provided across all tenures and unit sizes and be integrated within the Development. All homes at the seventh floor and above are served by at least two lifts.</p>



Policy	Policy Title	LBI Draft Local Plan	Assessment
		<ul style="list-style-type: none"> <li>i. be provided across all tenures and unit sizes, and integrated within the development;</li> <li>ii. be fitted out appropriately to enable occupation by a range of occupiers with diverse and changing needs; and be single-storey, preferably on the ground floor. Where provided above or below entrance level there must be at least two suitable lifts available for use by each unit within a convenient distance from the front door of the units.</li> </ul>	
		<p>C) Residential development must meet or exceed the minimum space standards, and address other requirements for private internal space, as set out in the London Plan and relevant Supplementary Planning Guidance (SPG). Appropriate consideration must also be given to:</p> <ul style="list-style-type: none"> <li>i. providing sufficient space for the general and specific storage needs of residents (including those with disabilities) living within dense urban development, where options for storing possessions are often very limited;</li> <li>ii. how recycling and waste arising from the occupation of the development will be stored, collected and managed, particularly for flatted residential development; and provision of rooms which are designed to function comfortably and efficiently for their intended purpose.</li> </ul>	<p>The homes have been designed to meet or exceed minimum space standards, including sufficient space for the storage needs of residents.</p> <p>Detail on the waste storage and collection is included within the Waste Management Plan, prepared by WSP.</p> <p>The rooms within the new homes are designed to function comfortably and efficiently for their intended purpose.</p>
		<p>D) Good circulation space must be provided within each residential unit. Multi-storey dwellings must provide space for provision of a stair lift, and a suitably identified space for a through-the-floor lift from the entrance level.</p>	<p>Good circulation space is provided within each residential unit.</p>
		<p>E) In new housing development, all habitable rooms, kitchens and bathrooms are required to have a minimum floor to ceiling height of 2.6 metres (between finished floor level and finished ceiling level). In residential conversions, including extensions, where the original ceiling height is maintained, a lower ceiling height may be acceptable where it can be demonstrated that overall a good standard of daylight, natural ventilation and useable floorspace can be provided.</p>	<p>All homes have a floor to ceiling height of 2.6m.</p>
		<p>F) Layout and design must accord strictly with tenure blind principles to maximise opportunities for social interaction. Development must be designed from the outset to ensure shared building access for both market and affordable units. Where applicants have demonstrated that this is not possible and/or where shared building access would demonstrably impact the level of affordable housing on site, building access for affordable units must:</p> <ul style="list-style-type: none"> <li>i. be accessible and located on main frontages or as close as possible to main frontages, unless location away from main frontages results in improved residential amenity;</li> <li>ii. ensure that the location of building access will not affect safety and security of residents or lead to negative perceptions of safety and security; and maintain the dignity of residents of affordable units and avoid locating building access for these units adjacent to waste/refuse areas and/or other building services.</li> </ul>	<p>The development has been designed to be tenure blind and to maximise opportunities for social interaction. Building entrances are on main frontages within the scheme, designed to ensure safety and security and not located adjacent to waste/refuse areas.</p>
		<p>G) Residential development, particularly flatted development and proposals involving the conversion of residential unit(s) into a larger number of units must consider the effect on</p>	<p>The development has been designed to ensure there is an acceptable relationship between</p>

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		<p>the amenity of adjacent properties, and put in place measures to address any adverse effects raised. This consideration should include (but is not limited to):</p> <ul style="list-style-type: none"> <li>i. internal layout, including the relationship of rooms on different floors within the scheme, and the position of entrances, extensions and fire escapes;</li> <li>ii. consideration of any overlooking or overshadowing impacts;</li> <li>iii. the impact on existing delivery and servicing provision; and</li> <li>iv. noise and vibration impacts (see also Part J of this policy).</li> </ul>	<p>dwelling. Consideration has been had to internal layouts, overlooking and overshadowing, delivery and servicing and noise and vibration impacts. Further detail is included within the Design and Access Statement and supporting technical reports.</p>
		<p>H) All new residential units should be dual aspect, unless provision of dual aspect is demonstrated to be impossible or unfavourable. Where such circumstances are demonstrated, all single aspect units must:</p> <ul style="list-style-type: none"> <li>i. provide a good level of daylight for each habitable room, and optimise opportunity for direct sunlight;</li> <li>ii. ensure that the aspect is not predominantly north-facing and does not face onto main roads or other significant sources of air pollution and/or noise and vibration, which would preclude opening windows;</li> <li>iii. provide a good level of natural ventilation throughout the dwelling via passive/non-mechanical design measures; and</li> <li>iv. ensure that future occupiers have a good level of privacy and do not experience adverse impacts from overlooking.</li> </ul>	<p>The provision of dual aspect accommodation has been maximised across the development, with 94% dual aspect units comprised of corner aspect and stepped/double aspect which provide windows at 90 degrees on two external walls, allowing future occupants views in two different directions.</p> <p>Where single aspect units are proposed, these are as a result of optimising the site capacity as required by Policy D3. All such single aspect units will achieve adequate levels of passive ventilation, daylight, privacy and will avoid overheating.</p>
		<p>I) The design of all residential development is required to maximise natural light into the room (subject to passive heating and cooling considerations). The glazing to all habitable rooms must be generous and should aim to be not less than 20% of the internal floor area of the room. All dwellings should provide for direct sunlight to enter the main habitable rooms for a reasonable period of the day.</p>	<p>The application is accompanied by a daylight sunlight assessment which considers the development against Policy H4 (I).</p>
		<p>J) All development proposals which include residential units must fully assess noise and vibration impacts on and between dwellings, in line with policy DH5. Proposals should:</p> <ul style="list-style-type: none"> <li>i. ensure residential units are sited away from sources of noise and vibration, to prevent impacts occurring; or</li> <li>ii. Where this is not possible, provide a detailed assessment of noise and vibration impacts. Where noise and/or vibration effects are identified suitable mitigation measures must be put in place to reduce these effects, through the proposed layout (including the interaction of non-residential and residential uses in mixed use developments), design and materials. If effects cannot be mitigated, planning permission will not be granted.</li> </ul>	<p>The application is accompanied by a Noise Impact Assessment. This has identified mitigation measures to reduce impacts of noise and vibration.</p>
		<p>K) All development proposals which include residential units must ensure that the overall approach to all entrances is logical, legible and level or gently sloping. The distance from parking spaces/drop-off points to the main entrance to the residential building must be no more than 50m. The total distance between a parking space/drop-off point and an individual dwelling entrance must be no more than 75m</p>	<p>The scheme complies with required accessibility standards and distances from the accessible car parking space to block entrance is maximum of 50m.</p>

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		<p>L) In all new residential development, the number of dwellings accessed from a single core must not be more than eight on each floor, although a smaller number is preferable. The following criteria must be addressed in relation to shared circulation space:</p> <ul style="list-style-type: none"> <li>i. Common/shared entrances should lead to a hall large enough for people to manoeuvre with shopping and/or baby buggies and/or wheelchairs with ease.</li> <li>ii. All dwellings should be provided with step-free or lift access.</li> <li>iii. Communal circulation corridors should ideally be 1,500mm wide, but no less than 1,200mm wide. Where they have an unobstructed width of less than 1,500mm, communal corridors should have wheelchair turning spaces at reasonable intervals.</li> <li>iv. Access cores must provide an access control system, with entry phones in all dwellings linked to a main front door with remote electronic lock release.</li> </ul>	<p>There is a maximum of 8 units per core in all blocks, apart from the Extra Care Units which have 12 units per core. This core is generously sized to promote interaction between residents and benefits from natural daylight.</p>
<b>H5</b>	<b>Private Outdoor Space</b>	<p>A) All new residential development and conversions will be required to provide private outdoor space, in the form of gardens (for houses and ground floor maisonettes) or balconies (for upper floor dwellings). Any provision must be of a good quality which is designed – in terms of its shape, position and location within development proposals – to ensure a good level of amenity with regard to daylight and sunlight, noise, enclosure, overlooking, privacy and security.</p> <p>B)</p> <p>C)</p> <p>D) The minimum requirement for private outdoor space is 5sqm on upper floors and 15sqm on ground floors, for 1-2 person dwellings. For each additional occupant, an extra 1sqm is required on upper floors and an extra 5sqm on ground floors.</p> <p>E) Balconies and other private external spaces must have a depth and width of not less than 1.5 metres.</p> <p>F) Communal provision of private outdoor space, in lieu of private outdoor space for each individual residential unit, will only be acceptable for non-family units, where:</p> <ul style="list-style-type: none"> <li>i. provision of individual private outdoor space is considered likely to cause significant adverse impacts related to overlooking and noise, both within and external to the development;</li> <li>ii. the provision of communal outdoor space would lead to a higher quality scheme overall;</li> <li>iii. the level of communal space provided is commensurate with the type and size of the accommodation and the households it is intended to serve; and</li> <li>iv. access to communal space is not restricted, particularly on basis of the tenure of residential units.</li> </ul> <p>G) Where roofs are utilised to provide private and/or communal outdoor space, proposals must demonstrate that:</p> <ul style="list-style-type: none"> <li>i. there are no adverse impacts relating to noise, overlooking and privacy of future residential occupiers as well as existing residents adjacent to the site;</li> </ul>	<p>Each unit will have access to dedicated private amenity space in the form of a garden, terrace or balcony. All amenity spaces are of a high quality in terms of shape, position and location and achieves a good level of amenity.</p> <p>This part is not relevant to the development.</p> <p>This part is not relevant to the development.</p> <p>Each unit will have access to dedicated private amenity space in the form of a garden, terrace or balcony which meet or exceed the minimum standards.</p> <p>All private external amenity spaces have a depth and width of at least 1.5m.</p> <p>All homes have access to dedicated private amenity space that meets the minimum requirements. Communal amenity space is also provided to each plot, in addition to the private amenity space.</p> <p>The development includes some roof level amenity space for residents of the relevant core which serves the roof space in question. No play space is proposed at roof level. The development also includes green roofs to ensure there are sufficient</p>

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		<ul style="list-style-type: none"> <li>ii. the space is designed to prevent crime and to ensure that security of residents is not compromised; and</li> <li>iii. use of roofs for amenity purposes is balanced with the use for green roofs and renewable energy equipment in line with relevant Local Plan policies, through careful design which prioritises and integrates the benefits for biodiversity, carbon reduction and amenity.</li> </ul>	benefits for amenity, biodiversity and carbon reduction.
		H) All new build residential developments and, where practicable, residential conversions, must provide step-free access and a level threshold from homes to private outdoor space.	Step-free access is provided from homes to private outdoor space.
		I) Any basement and/or ground floor unit must have a defensible space not less than 1.5 metres in depth in front of any window to a bedroom or habitable room.	All ground floor units will have defensible space of at least 1.5 metres in depth in front of any window to a bedroom or habitable room.
<b>H6</b>	<b>Purpose-built student accommodation</b>	This Draft Policy is not relevant to the proposals.	
<b>H7</b>	<b>Meeting the needs of vulnerable older people</b>	<p>A) The need for accommodation for older people will be met primarily through delivery of conventional residential accommodation designed to be adaptable to changing needs over time. Different levels of care may be delivered in conventional accommodation which means there is no need for certain specialist forms of older persons housing, in particular market extra care housing.</p> <p>B) There is some local need for affordable one and two-bed extra-care units. This specific type of specialist older persons accommodation may be acceptable on certain schemes, but only where the Council's Adult Social Care service consider that the proposed accommodation would meet a defined need.</p> <p>C) Specialist C3 and non-C3 older peoples residential accommodation such as care homes and extra care facilities will only be suitable where:</p> <ul style="list-style-type: none"> <li>i. there is an evidence of local unmet need for specialist older people accommodation;</li> <li>ii. affordable housing is provided in line with policy H3;</li> <li>iii. it has adequately considered and addressed all design issues in Part D or Part E to ensure the accommodation is suitable for the intended occupiers;</li> <li>iv. it provides the necessary level of supervision, management and care/support, which is secured in a legal agreement;</li> <li>v. it is easily accessible to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers; and</li> <li>vi. It constitutes a suitable use for the site considering the surrounding neighbourhood, potential for development of other priority land uses and its contribution to mixed and balanced communities.</li> </ul>	<p>The proposals include the provision of 60 self-contained Extra Care Units. These are included within Block E1.</p> <ul style="list-style-type: none"> <li>i. The Extra Care proviosn was requested by the Council in order to meet an identified need.</li> <li>ii. All the Extra Care Units would be social rent. This would form part of the overall affordable housing offer for the scheme. This satisfies Policy H3.</li> <li>iii. Compliance with Part D is set out below. Part E relates to care homes and is not relevant to the proposals.</li> <li>iv. The level of supervision, management and care/support will be discussed with Officers, alongside dicussion with respect to any S106 obligations.</li> <li>v. Plot E is sited adjacent to the public park. This distance from Plot E to Camden Road is 190m</li> </ul>

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			<p>and 210m (depending on route taken), and there are bus stops on Camden Road offering services to Wood Green and Hackney Central, via Seven Sisters Road which offers shops and services. In addition, Caledonian Road Station lies 800m from the Site.</p> <p>vi. The Extra Care Units form part of a wider residential-led scheme and will contribute to a mixed and balanced community.</p> <p>The proposed Extra Care Units are therefore compliant with Draft Policy H7 Part C.</p>
		<p>D) Extra care proposals will be usually classed as a C3 use. Such proposals must demonstrate that the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:</p> <ul style="list-style-type: none"> <li>i. The proposal is for provision of self-contained units (or at least en-suite private rooms which meet or exceed minimum space standards) which addresses other requirements for private internal space;</li> <li>ii. There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and any staff accommodation/rooms;</li> <li>iii. Appropriate bathrooms, kitchen/laundry facilities and appropriate rooms for activities/therapy/community use are provided;</li> <li>iv. Appropriate wheelchair accessibility is provided in line with policy H4;</li> <li>v. Good quality guest and/or staff accommodation (where appropriate) is provided in line with minimum space standards, with sufficient storage space and facilities for visitors and staff;</li> <li>vi. Servicing access and a safe drop off point is within 50m of the main entrance in line with H4; and</li> <li>vii. Provision of suitable charging points for mobility scooters is included on-site – with a minimum standard of secure scooter storage and charging facilities equivalent to 25% of dwellings.</li> </ul>	<p>Compliance with the criteria is set out as follows:</p> <ul style="list-style-type: none"> <li>(i) The proposal is for provision of self-contained units (which meet or exceed minimum space standards).</li> <li>(ii) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and any staff accommodation/rooms. Communal and staff spaces are provided at ground floor.</li> <li>(iii) Appropriate bathrooms, kitchen/laundry facilities and appropriate rooms for activities/therapy/community use are provided at ground floor.</li> <li>(iv) Policy H4 seeks 10% M4(3) homes and 90% M4(2). All of the Extra Care Units are designed as M4(3) homes, exceeding the policy requirement. This provision contributes to the 12% site wide provision of M4(3) homes. There will be two lifts serving the older person housing in accordance with Policy H4 Part B(iii).</li> <li>(v) A guest/staff suite is provided with an ensuite bathroom. Appropriate staff facilities are provided.</li> <li>(vi) The development provides accessible parking bays at a ratio 3% of the residential dwellings. The scheme also provides servicing bays and the Transport Assessment, provided by Velocity, sets out that this could also be used for drop-off and pick up activity. There are</li> </ul>

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			<p>accessible parking bays and a loading bay along the internal road adjacent to Plot E (within 50m).</p> <p>(vii) Safe storage and charging facilities for residents' mobility scooters is provided at lower ground level. There is space for 15 mobility scooters to be stored (25% provision). All spaces would have charging facilities.</p> <p>The proposed Extra Care Units are therefore compliant with Draft Policy H7 Part D.</p>
		E)	Part E of the Draft Policy is not relevant to the development.
		F)	Part F of the Draft Policy is not relevant to the development.
<b>H8</b>	<b>Self-build and Custom Housebuilding</b>	This draft policy is not relevant to the development.	
<b>H9</b>	<b>Supported Housing</b>	This draft policy is not relevant to the development.	
<b>H10</b>	<b>Houses in Multiple Occupation</b>	This draft policy is not relevant to the development.	
<b>H11</b>	<b>Purpose built Private Rented Sector Development</b>	This draft policy is not relevant to the development.	
<b>H12</b>	<b>Gypsy and Traveller Accommodation</b>	This draft policy is not relevant to the development.	
<b>SC1</b>	<b>Social and Community Infrastructure</b>	A) The Council will support proposals to provide new and/or extended social and community infrastructure facilities and their co-location with other social and community uses, subject to an assessment against all relevant Local Plan policies.	The Holloway Prison Site SPD seeks a Women's Building as part of the redevelopment of the Site that incorporates safe space to support women in the criminal justice system and services for women. This is carried forward into the emerging allocation
		B) Social and community infrastructure will be funded through the CIL and/or section 106 planning obligations (as appropriate). In addition, new and/or extended on-site provision of	

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		<p>social and community infrastructure may be required as part of the supporting infrastructure for significant new housing and mixed-use development proposals, in order to mitigate the impacts of the development on local services and meet the needs of occupiers.</p> <p>C) Where a proposed social and community infrastructure use/facility is deemed necessary to mitigate the impacts of existing or development (e.g. a health centre to serve the residents of a large housing scheme), that specific use will be secured at planning stage.</p> <p>D) Where new and/or extended social and community infrastructure is provided on-site it must be designed in line with criteria in part H.</p> <p>E) Where a change of use falls within planning control the Council will not permit any loss of social and community infrastructure uses unless:</p> <ul style="list-style-type: none"> <li>i. a replacement facility is provided on-site. Any facility must be of at least equivalent quality, quantity and accessibility to that of the existing facility, and must be consistent with Part G. It must, in the Council's view, ensure that the needs of the local population will continue to be met to at least the same level as the existing use; or</li> <li>ii. the existing use or another social and community infrastructure use is not required on site, demonstrated through: <ul style="list-style-type: none"> <li>a) provision of marketing and vacancy evidence to assess continued demand for the existing use and all other suitable social and community infrastructure uses that could be accommodated on site. Evidence must be provided for a period of at least 12 months, in line with Appendix 1; and</li> <li>b) provision of a Community Needs Assessment detailing why the site cannot support social and community infrastructure uses and why the existing use is no longer required on-site as well as demonstrating that the needs of service users have been considered before making recommendations/submitting proposals involving replacement or relocation or consolidation of services; or</li> </ul> </li> <li>iii. The proposal involves the loss/reduction/relocation of social and community infrastructure uses as part of a rationalisation of a recognised public sector body's estates programme. The applicant will be required to provide a Community Needs Assessment demonstrating details of rationalisation, including that they have considered the needs of service users as part of any rationalisation strategy.</li> </ul> <p>F) Where, in the Council's view, there is an ongoing need for the service/facility currently operating from the site and it cannot be re-provided as part of the development, its loss will not be permitted unless the applicant has secured provision of at least equivalent quality, quantity and accessibility which meets criteria set out in part G. The Community Needs Assessment must demonstrate that they have considered the needs of service users before</p>	<p>for the Site in the Draft Local Plan. Neither the SPD nor Draft Local Plan specify a minimum or maximum required size for the facility. LBI published a draft Women's Building Development Brief in June 2020 which sought a facility of between 800sqm to 1,200sqm.</p> <p>The development exceeds the range set out in the draft Women's Building Development Brief (June 2020) and includes the provision a 1,489sqm Women's Building located to Plot C. The facility incorporates safe space to support women in the criminal justice system and services for women. This accords with Development Management Policies DPD Policy DM4.12 Part A(i), the Holloway Prison Site SPD, and the emerging allocation. Draft Local Plan Policy SC1 Part D(i) requires criteria in Part G of the Draft Policy to be met. Each criterion is satisfied as follows and the development accords with Draft Local Plan Policy SC1.</p> <ul style="list-style-type: none"> <li>• The Women's Building is located in an area convenient for the community it will service and is accessible by a range of sustainable transport modes, including walking, cycling and public transport. This satisfies with Part G(i).</li> <li>• The Women's Building is inclusive, accessible, flexible, sustainable and provides design and space standards which meet the needs of intended occupants. This satisfies with Part G(ii).</li> <li>• Given the highly accessible nature of the Site to public transport, the development is 'car free', with the exception of accessible spaces to serve the residential element of the development. A series of loading bays are provided across the development which could be utilised for drop-off/pick-up facilities for disabled people should the Council consider this necessary. This satisfies with Part G(iii).</li> </ul>



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		<p>making recommendations/submitting proposals involving the loss, relocation or consolidation of services.</p> <p>G) Development resulting in the provision of new social and community infrastructure that is not generally accessible to the public, such as school sports facilities, will be required to enter into Community Use Agreements to allow and promote access to the facility by local communities.</p> <p>H) New social and community infrastructure and, where applicable, extensions to existing infrastructure must: (i) be located in areas convenient for the communities they serve and accessible by a range of sustainable transport modes, including walking, cycling and public transport; (ii) provide buildings that are inclusive, accessible, flexible, sustainable and which provide design and space standards which meet the needs of intended occupants; (iii) provide appropriate drop-off/pick-up facilities for disabled people; (iv) be sited to maximise shared use of the facility, particularly for sports, recreational and community uses; and (v) complement existing uses and the character of the area, and avoid adverse impacts on the amenity of surrounding uses.</p> <p>I) Proposals involving new/redeveloped social and community infrastructure should provide free, publicly available provision of accessible toilet, baby change and drinking water facilities. 'Changing Places' toilets will be required in appropriate social and community facilities.</p>	<ul style="list-style-type: none"> <li>The Women's Building has been sited to maximise use of the facility. The final operator/s of the Women's Building has not yet been determined but it may be shared by multiple women's services providers. Given the nature of the facility there is limited scope for sport and recreation, however opportunities for these activities is provided in the publicly accessible Public Garden. This satisfies with Part G(iv).</li> <li>The Women's Building complements existing uses and the character of the area, and avoids adverse impacts on the amenity of surrounding uses. This satisfies with Part G(v).</li> </ul> <p>In addition, the Women's Building satisfies criteria H(i)-(ii) and (iv)-(v). with respect to criteria H(iii) given the highly accessible nature of the Site to public transport the development is 'car free' with the exception of accessible spaces to serve the residential element.</p> <p>Given the security needs of the Women's Building a publicly available toilet cannot be provided.</p>
<b>SC2</b>	<b>Play Space</b>	<p>A) The Council will strongly resist the loss of existing play spaces across the borough unless replacement play space of equivalent size and functionality is provided to meet the needs of the local population. Any replacement space must be provided on-site or in the immediate vicinity, and access must be unrestricted.</p> <p>B) The Council will protect all twelve of the borough's adventure playgrounds designated on the Policies Map and listed in Appendix 7.</p> <p>C) All major residential development must make appropriate on-site provision for free-to-use publicly accessible play space, which is suitable for children and young people of all ages and abilities. Provision must be proportionate to the anticipated increase in child population as a result of development proposals. All proposed provision of new play space within development sites must be designed in partnership with Islington Council, in line with any relevant best practice standards.</p> <p>D) All developments (including large-scale public realm schemes) must provide playable public space where possible, in addition to any formal play space provision. This play space should encourage children and young people to move around freely and safely through streets and footpath networks that connect to more formal play provision, green spaces and parks.</p>	<p>The development includes 5,292sqm of play space. This quantum is based on 10sqm per child, as per London Plan Policy S4, and the number of children and age split calculated with the GLA's Population Yield calculator based on the scheme mix and tenure of the residential units. This provides a stimulating environment with a wide range of opportunities for different age groups and abilities.</p> <p>The play space is located so that it can be accessed by children and young people and the scheme utilises safe and enclosed communal gardens for provision of additional play opportunities. 100% of the play space is provided at ground and first floor level to make it accessible to all age groups and abilities. This includes a large, public 'destination' play area at the heart of the site for all ages and abilities which will be publicly accessible.</p>



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			The play provision has been designed and located to enable passive surveillance. The scheme includes space for teenagers and young adults which are activated, sufficiently lit and well overlooked.
SC3	Health Impact Assessment	A) The Council will require all major developments, and developments where potential health issues are likely to arise, to complete a screening assessment as early as possible in the development process, to determine whether a full Health Impact Assessment (HIA) is required.	A Health Impact Assessment, prepared by WSP, accompanies this planning application.
		B) Where the screening assessment identifies that a full HIA is required, this must be prepared as early as possible in the development process so that potential health gains can be maximised and any negative impacts can be mitigated. HIAs, where required, must be proportionate to the scale of the development.	
		C) The scope of any HIA must be agreed with the Council's Public Health department, and must be informed by relevant Council guidance.	
SC4	Promoting Social Value	A) All development in Islington is encouraged to maximise social value in order to deliver as many public benefits as possible.	This planning application is accompanied by a completed Social Value Self-Assessment. This is included within the Planning Statement.
		B) Major development proposals must undertake a Social Value self-assessment which clearly sets out the specific social value which would be added through delivery of the proposal.	
<b>Chapter 4 – Inclusive Economy</b>			
B1	Delivering Business Floorspace	A) In line with the Local Plan objectives, in particular the aim to deliver an inclusive economy, the Council will seek to cultivate a diverse and vibrant economic base through requiring development to provide a range of workspace types and unit sizes, which are affordable for a range of occupiers, including established and emerging enterprises, and SMEs.	The Development provides 1,822sqm of flexible commercial floorspace at ground floor plots, providing a range of unit sizes. Taken as a whole, the development could support a total of between 46 and 269 gross FTE permanent jobs. This is expressed as a range given the employment generation could vary within the flexible Class E commercial space and within the Women's Building and reflects the minimum and maximum estimated job creation for the scheme.  Therefore, the proposals contribute towards job generation in the local area and will provide a source of long-term employment for local people.  The Development will support employment, skills development, apprenticeship and other education and training opportunities in both the construction
		B) New business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ fringe Spatial Strategy areas of Angel and Upper Street and Kings Cross and Pentonville Road, PELs and Locally Significant Industrial Sites. Proposals in these areas must maximise the amount of new business floorspace; proposals which do not demonstrate maximisation will be considered to be an inefficient use of a site and will be refused.	
		C) The Council is committed to ensuring there is an adequate supply of business space in line with job growth projections and will protect existing business space throughout the borough through implementing planning policies which seek to ensure, at least, no net loss of business floorspace, and through the making of Article 4 Directions, where appropriate.	
		D) The Council will aim to secure space that fosters the development and expansion of businesses, particularly space suitable for start-ups and small businesses. This includes the delivery of affordable workspace; and the provision of small units suitable for SMEs	
		E) Islington's Locally Significant Industrial Sites are the focus for new industrial uses, namely light industrial, B2 general industrial and B8 storage and distribution uses, including Sui	

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		<p>Generis uses akin to priority industrial uses. Existing industrial land and floorspace will be safeguarded and the introduction of non-industrial uses will not be permitted. The renewal, modernisation and intensification of industrial uses will be encouraged.</p> <p>F) Development in the borough must provide jobs and training opportunities/support.</p>	<p>and end-use phases. This will be secured in the s106 legal agreement as appropriate.</p> <p>The Site is not located within a town centre or in the CAZ, however, does have a PTAL rating of 6a ('excellent'), therefore has strong public transport connectivity that the proposed employments spaces can benefit from.</p> <p>No affordable workspace is provided as part of the development.</p>
<b>B2</b>	<b>New Business Floorspace</b>	<p>A)</p> <p>B)</p> <p>C)</p> <p>D)</p> <p>E)</p> <p>F) Outside of the locations mentioned in Parts A, C and D, new business floorspace is acceptable where it would not detract from the character of the local area; and would not detrimentally impact on residential amenity. Proposals for new business floorspace in these locations must be accessible to all in accordance with the priority for sustainable modes of transport set out in policy T1, and must not prejudice the overall aim of reducing the need to travel.</p> <p>G) All development proposals involving business floorspace (including affordable workspace provided in line with policy B4) must have regard to the following:</p> <ul style="list-style-type: none"> <li>i. Business floorspace must allow for future flexibility for a range of occupiers, including future subdivision and/or amalgamation, and provide a range of unit types and sizes, including a significant proportion of small units, particularly for SMEs. Full separation of business and residential floorspace is required where business floorspace forms part of a mixed use residential development.</li> <li>ii. Provision of a good level of amenity for occupiers of the business floorspace, including adequate levels of daylight and sunlight; and access to communal/ancillary facilities including meeting rooms.</li> <li>iii. The development of new business floorspace must incorporate the highest inclusive design standards achievable in context, and meet the travel and transport needs of those for whom public transport remains inaccessible.</li> <li>iv. Applicants must clearly demonstrate how the design of proposals individually and cumulatively contribute to providing the range of spaces required to support the primary function/sector of the particular area in which it is located.</li> <li>v. Ancillary uses must be clearly linked to the operation of the business floorspace.</li> </ul> <p>H)</p>	<p>The Development provides 1,822sqm of flexible commercial floorspace at ground floor plots, providing a range of unit sizes to allow for a range of uses. This could come forward for occupation as offices.</p> <p>Part A-E and H-I of this Draft Policy are not relevant to the development.</p>

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<b>B3</b>	<b>Existing Business Floorspace</b>	This draft policy is not relevant to the development.	
<b>B4</b>	<b>Affordable Workspace</b>	This draft policy is not relevant to the development as no affordable workspace is provided.	
<b>B5</b>	<b>Jobs and Training Opportunities</b>	<p>A) On-site construction training opportunities for local residents are required from developments of 10 residential units or above; hotels, student accommodation or hostels with 20 or more rooms; and non-residential developments with an uplift in floorspace of 500sqm GEA or greater.</p> <p>B) Jobs and training opportunities, including apprenticeships, will be required from developments where there is an uplift of 500sqm GEA of employment floorspace (i.e. any employment generating use).</p> <p>C) Financial contributions to help support initiatives which tackle worklessness will be sought as set out in the Planning Obligations (Section 106) SPD and its future updates and/or other relevant supplementary documents.</p>	On-site job and construction training opportunities for local residents will be provided as part of the Development and secured within the s106.
<b>Retail, leisure and services, culture and visitor accommodation</b>			
<b>R1</b>	<b>Retail, leisure and services, culture and visitor accommodation</b>	<p><b>Retail, leisure and services</b></p> <p>A) Town Centres are a focal point for commercial, cultural and civic activity in the borough. There are four Town Centres in Islington: Angel; Nags Head; Finsbury Park; and Archway. Each Town Centre has its own character and serves different functions, which must be maintained and enhanced. Each Town Centre is covered by a specific Spatial Strategy, set out in chapter 2. The Town Centre boundaries are defined on the Policies Map and shown in Figures 4.2 to 4.5 below.</p> <p>B) The Council will seek to ensure that all Town Centres develop in a way that supports their continued vitality and viability to meet the needs of local residents, and provide a diverse retail and leisure experience for residents, workers and visitors alike. In order to support Town Centres, the Council is seeking a proportionate tiered approach to development involving Class E proposals where alongside recognising the flexibility provided Class E, impacts are appropriately considered using assessments in relation to the scale of a proposal and the location of a proposal.</p> <p>C) Primary Shopping Areas are where retail are concentrated in Islington's Town Centres. The Primary Shopping Area boundaries in each Town Centre are defined on the Policies Map and shown in Figures 4.2 to 4.5 below. Where possible retail uses will be maintained in Primary Shopping Areas. Outside the Primary Shopping Area, a range of main Town Centre uses are considered suitable, in order to promote and encourage diverse shopping and leisure destinations.</p> <p>D) LSAs provide more local services, particularly essential convenience retail which caters for daily shopping needs. Some LSAs also have a more diverse mix of commercial uses,</p>	<p>The development includes the provision of 1,822sqm Class E floorspace to be provided fronting Parkhurst Road (Plot B) or the Public Garden (Plot C), designed to meet the everyday and essential shopping and service needs of the new resident population and to activate the street frontage along Parkhurst Road.</p> <p>As the Site is not located within a town centre, this planning application is accompanied by a Main Town Centre Uses Impact Assessment prepared by WSP. The scope of this assessment was agreed with LBI during pre-application discussions.</p> <p>The Main Town Centre Uses Impact Assessment concludes that there are no sequentially preferable sites which can appropriately accommodate the proposed floorspace and meet the same needs as the development. Further, the development will not result in significant adverse impact on the vitality and viability of any existing, planned or committed centres within the catchment.</p>

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		particularly leisure uses, which can help to sustain the vibrancy of these areas. LSAs are identified on the Policies Map.	On this basis, it is considered that the development passes the sequential test and fully complies with Draft Policy R1.
		E) There are a number of other retail and leisure uses that provide a valuable service to local communities but are not within specifically designated areas. These dispersed uses, particularly within retail and café/restaurant use, will be protected where possible.	
		F) Residential uses have significant potential to cause adverse impacts on the vitality and viability of designated retail areas. As such, they must be located outside the Primary Shopping Area (where proposed in a Town Centre) and situated on upper floors (where proposed elsewhere in Town Centres or in LSAs). Residential uses must also fully prevent/mitigate risk of future impacts through their design, consistent with relevant Local Plan policies including the agent-of-change principle.	The development does not include Visitor Accommodation.
		G) Small shops contribute to the unique character of Islington and support local businesses. The Council will protect the ancillary space of ground floor units and retail units where possible. The Council will promote new small shop provision as part of new developments at ground floor.	
		H) Specialist Shopping Areas, such as Fonthill Road and Camden Passage, add to the unique selling proposition and character within Angel and Finsbury Park Primary Shopping Areas and contribute to the vitality and viability of the borough. Retail uses in this area will be strongly protected.	
		I) Retail, service and leisure uses will be resisted where, by virtue of their location and/or concentration, they would have negative impacts on the character, function and amenity of an area or would negatively impact on the health and wellbeing of the borough's residents. The impact of a concentration of similar Class E uses may be considered where planning permission for development is sought.	
		J) Within retail areas, streets will be actively managed to balance the demands on the public realm from businesses, particularly restaurants and cafés, and the need for easy pedestrian movement. Active frontages will be promoted.	
		K) New retail development must incorporate the highest inclusive design standards achievable in context, in line with relevant guidance produced by the Council.	
		<b>Culture and Night-Time Economy</b>	
		L) Cultural uses are an essential part of Islington's social and economic fabric and their loss or diminution will be strongly resisted.	
		M) Islington has a varied night-time economy which the Council will seek to protect and enhance where appropriate. Concentrations of night-time economy uses exist in the borough including in designated Cultural Quarters. The Council will work with partners to support and manage a thriving and safe night-time economy that is well served by safe, convenient and sustainable night-time transport."	
		N) Angel Town Centre, Archway Town Centre and part of the Clerkenwell and Farringdon area are designated Cultural Quarters. All development proposals within Cultural Quarters must	

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		<p>enhance the Cultural Quarter by providing new/improved cultural uses and/or uses which support the cultural function within the Quarter and the character of the area.</p> <p>O) Pubs are part of Islington's social fabric and they contribute positively to Islington's culture, character and economy. The loss of pubs will be resisted, and new pubs encouraged where appropriate.</p> <p>P) The development of new cultural and night-time economy uses must incorporate the highest inclusive design standards achievable in context, in line with relevant guidance produced by the Council.</p> <p><b>Visitor Accommodation</b></p> <p>Q) To ensure that land is safeguarded for uses which are greater strategic priorities in Islington, development, redevelopment and/or intensification of visitor accommodation will only be supported in specific locations.</p> <p>R) Visitor accommodation must be well-designed, accessible and sustainable.</p>	
<b>R2</b>	<b>Primary Shopping Areas</b>	The Development Site is not located within a Primary Shopping Area, and therefore this Draft Policy is not relevant to the development.	
<b>R3</b>	<b>Islington's Town Centres</b>	<p>A) The Council will seek to maintain and enhance the retail, service and leisure function of Islington's four Town Centres, which are designated on the Policies Map and shown on Figures 4.2 to 4.5.</p> <p>B) Proposals for main Town Centre use floorspace should be located within a designated Town Centre. Proposals for these uses outside a designated Town Centre will only be permitted where they meet relevant criteria under Part C, D or E.</p> <p>C)</p> <p>D)</p> <p>E)</p> <p><b>Edge of centre/Out of Centre</b></p> <p>F) Any proposal for main Town Centre uses in an edge-of-centre location outside LSAs or in an out-of-centre location must:</p> <ul style="list-style-type: none"> <li>i. meet the sequential test and actively investigate and consider sequentially preferable locations in line with the Council's retail hierarchy, and provide robust justification for not locating in sequentially preferable locations; and</li> <li>ii. provide a detailed impact assessment which determines whether there would be likely significant adverse impacts on relevant Town Centres and/or LSAs.</li> </ul> <p>G)</p> <p>H)</p>	<p>The development includes the provision of 1,822sqm Class E floorspace to be provided fronting Parkhurst Road (Plot B) or the Public Garden (Plot C), designed to meet the everyday and essential shopping and service needs of the new resident population and to activate the street frontage along Parkhurst Road.</p> <p>As the Site is not located within a town centre, this planning application is accompanied by a Main Town Centre Uses Impact Assessment prepared by WSP. The scope of this assessment was agreed with LBI during pre-application discussions.</p> <p>The Main Town Centre Uses Impact Assessment concludes that there are no sequentially preferable sites which can appropriately accommodate the proposed floorspace and meet the same needs as the development. Further, the development will not result in significant adverse impact on the vitality and viability of any existing, planned or committed centres within the catchment.</p>

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			Part C to E and G to H of the Draft Policy are not relevant to the development.
<b>R4</b>	<b>Local Shopping Areas</b>	The Site is not located within a Local Shopping Area, and therefore this Draft Policy is not relevant to the development.	
<b>R5</b>	<b>Dispersed Retail and Leisure Uses</b>	The Site is not an existing dispersed retail and leisure use, and therefore this Draft Policy is not relevant to the development.	
<b>R6</b>	<b>Maintaining and enhancing Islington's unique retail character</b>	<p>A) The Council views the retention of small shops as a baseline and places great weight on the need to retain any retail units which currently or potentially could be utilised by small retailers. In order to encourage new provision of small retail units, the Council will seek to secure small retail units (generally considered to be units of around 80sqm GIA or less) suitable for occupation by small retailers by:</p> <ul style="list-style-type: none"> <li>i. requiring proposals for new retail development to incorporate small retail premises, proportionate to the scale of the proposal;</li> <li>ii. requiring proposals for the redevelopment of small retail units to incorporate adequate re-provision of small units to compensate for any loss, particularly for essential services;</li> <li>iii. requiring proposals for major housing developments to incorporate small retail units where there is no accessible provision of essential daily goods available within a short walking distance (within 300m); and</li> <li>iv. where appropriate, attaching conditions to permissions for small shop units, requiring planning permission to be sought for the future amalgamation of units into larger premises; specifying a certain level of convenience goods in order to protect and promote essential services; and/or making planning consent personal to a specific individual/organisation.</li> </ul> <p>B)</p>	<p>The development includes the provision of 1,822sqm Class E floorspace to be provided fronting Parkhurst Road (Plot B) or the Public Garden (Plot C), designed to meet the everyday and essential shopping and service needs of the new resident population and to activate the street frontage along Parkhurst Road. The commercial floorspace is split across a range of unit sizes.</p> <p>Part B of the Draft Policy is not relevant to the development.</p>
<b>R7</b>	<b>Markets and Specialist Shopping Areas</b>	The existing Site does not contain any Markets or Specialist Shopping Areas, therefore the Draft Policy is not relevant to the development..	
<b>R8</b>	<b>Location and Concentration of Uses</b>	A) Proposals will be resisted where they result in an unacceptable concentration of uses, such as night-time economy uses, hot food takeaways, betting shops and other gambling facilities, payday loan shops, estate agents. The wide range of Class E uses also allows for overconcentration of certain uses such as but not limited to café/restaurants that have potential to cumulatively cause heightened adverse amenity impacts. Concentration of uses will be assessed based on the number of units within a 500m radius of the development. Proposals must be accompanied by sufficient information to allow for assessment of	The development includes the provision of 1,822sqm Class E floorspace to be provided fronting Parkhurst Road (Plot B) or the Public Garden (Plot C), designed to meet the everyday and essential shopping and service needs of the new resident population and to activate the street frontage along Parkhurst Road.

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		<p>concentration and potential impacts, including information on how these uses will be managed and operated.</p> <p>B) In addition to the general assessment of overconcentration in Part A:</p> <ul style="list-style-type: none"> <li>i. proposals for hot food takeaways (Sui Generis Use Class) will be resisted within 200m of primary and secondary schools.</li> <li>ii. proposals for hot food takeaways (Sui Generis Use Class) will be resisted where: <ul style="list-style-type: none"> <li>a) they would result in 4% or more of total units being in hot food takeaway use, in LSAs of 26 units or more; or</li> <li>b) they would result in two or more hot food takeaway units, in LSAs with 25 units or less.</li> </ul> </li> <li>iii. proposals for betting shops and adult gaming centres will be resisted where: <ul style="list-style-type: none"> <li>a) they would result in 4% or more of total units being in betting shop/adult gaming centre use, in LSAs of 26 units or more; or</li> <li>b) they would result in two or more betting shop/adult gaming centre units, in LSAs with 25 units or less.</li> </ul> </li> <li>iv. proposals for betting shops or adult gaming centres in Town Centres will not be permitted where there is an existing betting shop or adult gaming centre within 200m walking distance; or where the resulting amount of betting shops and adult gaming centres would exceed 1.5% of the total units in the Town Centre.</li> </ul> <p>C) Where proposals for uses serving food and drink are permitted – particularly café/restaurant and hot food takeaway uses, and retail uses such as coffee shops and sandwich bars – a condition will be attached to require the operator to achieve, and operate in compliance with, the Healthier Catering Commitment standard.</p> <p>D)</p>	<p>The development seeks Class E use. This would not allow for hot food takeaways, betting shops, adult gaming stores or amusement centres.</p> <p>As the Site is not located within a town centre, this planning application is accompanied by a Main Town Centre Uses Impact Assessment prepared by WSP. The scope of this assessment was agreed with LBI during pre-application discussions.</p> <p>The Main Town Centre Uses Impact Assessment concludes that there are no sequentially preferable sites which can appropriately accommodate the proposed floorspace and meet the same needs as the development. Further, the development will not result in significant adverse impact on the vitality and viability of any existing, planned or committed centres within the catchment.</p> <p>Part D of the Draft Policy is not relevant to the development.</p>
<b>R9</b>	<b>Meanwhile /temporary uses</b>	This draft policy is not relevant to the development.	
<b>R10</b>	<b>Culture and Night-Time Economy</b>	This draft policy is not relevant to the development.	
<b>R11</b>	<b>Public Houses</b>	This draft policy is not relevant to the development.	
<b>R12</b>	<b>Visitor Accommodation</b>	This draft policy is not relevant to the development.	
<b>Chapter 5 - Green Infrastructure</b>			
<b>G1</b>	<b>Green Infrastructure</b>	A) Green infrastructure is an integral part of what makes the borough sustainable, healthy, welcoming and attractive. It is extremely important in terms of addressing the Local Plan vision and objectives. Development proposals must preserve and enhance existing green infrastructure, and, where relevant, provide new green infrastructure. Opportunities to	The development provides a significant amount of public open space and has incorporated significant landscaping to create high-quality open spaces and private amenity space and has sought to retain



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		<p>connect new/enhanced green infrastructure to existing green infrastructure must be thoroughly investigated.</p> <p>B) Developers must consider green infrastructure at an early stage of the design process as part of an integrated design approach and incorporate the provision of green infrastructure into the design rather than as an 'add on' at the end of the design process.</p> <p>C) Development proposals must assess the value and benefits of existing green infrastructure on-site and adjacent to sites; and identify interventions that could improve green infrastructure value and benefits.</p> <p>D) Sites with a low existing green infrastructure value represent particular opportunities to increase green infrastructure functions. The Council will not consider existing site circumstances as the baseline for new provision.</p> <p>E) Major developments are required to conduct an Urban Greening Factor (UGF) assessment in accordance with the methodology in the London Plan. Schemes must achieve an UGF score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.</p> <p>F) Development must contribute to the implementation of green infrastructure strategies including the All London Green Grid.</p>	<p>existing trees. Landscaping has been central to the proposed design. The approach has been based on connecting to the wider landscape, reducing cars and prioritising people, creating a place for people and using ecology to define spatial types. The key site-based strategies have been to retain the green heart of the site, connect the site to its surroundings and transform a once inward-facing and closed off space into an opening and welcoming space. Further detail is included in the Open Space and Recreation Assessment and Landscapae Design Strategy prepared by Exterior Architecture which accompanies this planning application.</p>
<b>G2</b>	<b>Protecting Open Space</b>	The Site does not include any existing public open space and therefore this draft policy is not relevant.	
<b>G3</b>	<b>Public Open Space</b>	<p>A) Developments in excess of 200 net additional residential units or 10,000sqm net additional gross external floorspace, or where a specific need has been identified by the Council, are required to provide on-site publicly accessible public open space. The level of provision must be proportionate to the size of the proposal and the number of intended occupiers/users. Public open space must be provided in addition to private amenity space and landscaping and must provide unrestricted public access, in perpetuity.</p> <p>B) Public open space should normally be green public open space, such as a public park. Areas of new or improved hard landscaped public open space, such as civic space, may be considered appropriate instead of green public open space in certain areas (such as Town Centres), and will be assessed on a case-by-case basis. In such cases it must be demonstrated that the provision of green public open space is not possible or appropriate. Hard landscaped space must maximise greening features such as planting and permeable paving.</p> <p>C) New or improved public open space provision must:</p> <ol style="list-style-type: none"> <li>i. create/improve links with other green infrastructure and permeability with the wider area;</li> <li>ii. maximise biodiversity benefits and access to nature, by incorporating areas of biodiversity that complement surrounding habitats and support the Council's Biodiversity Action Plan;</li> <li>iii. maximise sustainability benefits, including urban cooling and sustainable drainage, including the use of permeable surfaces;</li> </ol>	<p>The development provides 10,480sqm of public open space, formed of the Public Garden (public park), nature garden and Trecastle connection. In accordance with Development Management Policies DPD Policy 6.2 and Draft Local Plan Policy G3, the public open space is provided in addition to private amenity space and landscaping and shall be fully publicly accessible, without any restrictions and maintained in perpetuity. The public open space provision has been considered in the context of the suggested standard of 5.21sqm per resident and 2.6sqm per employee set out in the supporting text to the adopted and draft policies, as set out in the table below. Based on the suggested standard, between 11,616.507 sqm to 12,196.307 sqm of public open space would be sought. This is expressed as a range given the employment generation could vary within the flexible Class E commercial space and within the Women's Building and reflects the minimum and maximum estimated job creation for the scheme. The development</p>



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		<p>iv. be designed to be safe and accommodate and encourage physical activity for all, promoting walking, cycling and social interaction; and</p> <p>v. be overlooked, designed and managed to meet diverse and changing needs.</p> <p>D) The temporary use of sites (such as those awaiting development) for public open space, sport and recreation, or nature conservation must be considered. This includes very small sites such as pocket parks and the use of parking spaces as parklets.</p> <p><u>Supporting text:</u> The Council will seek on-site open space from large developments, to meet the increased demand for open space that these developments will create and to help address the existing shortfall of provision in Islington. The level of provision must be proportionate to the size of the proposal and the number of intended occupiers/users. Evidence suggests that a standard of open space of 5.21sqm per resident and 2.6sqm per employee should be provided. This standard must be used to inform the level of public open space provision.</p>	<p>provides 10,480sqm of public open space, which equates to between 85.9% and 90.2% of the suggested standard taking into account the quantum of residents and the minimum and maximum estimated job creation. In addition, the development provides further open space which will be publicly accessible along the Camden/Parkhurst Road frontage. This area comprises 1,463 sqm and will include new street trees, cycle parking, ecological planting, spill-out spaces and seating. When considered alongside the above spaces, the development totals 11,943sqm, which equates to between 97.9% to 102.8% of the suggested standard.</p> <p>The development is considered to provide an appropriate quantum of public open space, taking into account other policy requirements, the need to ensure best use of the land and the wider public benefits the development delivers including the significant provision of housing and affordable housing.</p> <p>A net gain in biodiversity is also secured.</p>
<b>G4</b>	<b>Biodiversity, landscape design and trees</b>	<p>A) All developments must protect, enhance and contribute to the landscape, biodiversity value and growing conditions of the development site and surrounding area, including protecting and enhancing connectivity between habitats.</p> <p>B)</p> <p>C) Development proposals involving the creation of new buildings, redevelopment of existing buildings or large extensions must submit a Landscape Design Strategy (as part of the Sustainable Design and Construction Statement) which maximises green infrastructure, biodiversity and sustainable drainage. This must consider landscape design holistically from the outset of the design process and demonstrate the following:</p> <ul style="list-style-type: none"> <li>i. An integrated approach to hard and soft landscaping design, prioritising soft landscaping and urban greening, including areas of unconstrained planting;</li> <li>ii. Consideration of existing and proposed trees, hedges, shrubs and other vegetation of landscape or environmental significance, and their impact on biodiversity, sustainable drainage, air quality and urban cooling;</li> <li>iii. Achieving a functional, attractive and inclusive design;</li> <li>iv. Maximising biodiversity benefits and ecological connectivity, including through the protection and enhancement of existing biodiversity, and the incorporation of new areas of biodiversity and opportunities for wildlife, including green roofs and vertical</li> </ul>	<p>The Site is not designated (statutorily or non-statutorily) for any nature conservation value.</p> <p>The planning application is accompanied by an Ecology Assessment included within the Environmental Statement in order to ensure that the proposals manage impacts on biodiversity. The Ecological Assessment includes a series of recommendations in order to enhance and protect the ecological value of the Site. These recommendations have been incorporated into the proposed landscaping scheme and overall design.</p> <p>The application is accompanied by an Open Space and Recreation and Landscape Design Strategy. The proposed landscaping scheme for the site will deliver a substantial net gain in the number of trees and canopy cover for the site. This includes the</p>

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		<p>greening. Development proposals must aim to secure a net gain in biodiversity value, with a clear priority for on-site measures;</p> <ul style="list-style-type: none"> <li>v. Incorporation of Sustainable Urban Drainage Systems (SUDS) into the landscape design as part of an integrated approach which maximises biodiversity and water use efficiency alongside other benefits including, where appropriate and practical, amenity and recreation;</li> <li>vi. Incorporation of suitable wildlife habitats, including micro-habitats;</li> <li>vii. Consideration of the potential impact on biodiversity of lighting, noise or shading, and adoption a lighting scheme design that minimises impacts on biodiversity;</li> <li>viii. Provision of a robust planting design that can sustain itself without intensive maintenance and/or intervention;</li> <li>ix. Incorporation of appropriate maintenance arrangements that will be put in place from the outset of the development, including a requirement for a specific management plan secured by planning condition where necessary; and</li> <li>x. Integration of food growing opportunities, where feasible and practical.</li> </ul>	<p>planting of 364 new trees. A net gain in biodiversity is secured. The development includes a number of sustainable urban drainage systems including rain gardens and green roofs.</p> <p>Part B of this Draft Policy is not relevant to the development.</p>
		<p>D) All developments must protect and enhance site biodiversity, including wildlife habitats, trees and measures to reduce deficiencies in access to nature. Developments involving refurbishment and/or extension of existing buildings must be designed and implemented to reduce impact on existing species and their habitats.</p>	
		<p>E) Biodiversity benefits and ecological connectivity must be maximised through planting design, ecological landscaping, and the incorporation of areas of biodiversity that complement surrounding habitats and support the Council's Biodiversity Action Plan. Species chosen for planting must maximise biodiversity benefit, be beneficial to wildlife and complement the existing habitat. Habitat features must be incorporated on-site to support existing species of wildlife and provide opportunities for new wildlife.</p>	
		<p>F) All developments, including refurbishment works, must carry out ecological surveys and assessments wherever the development is likely to have an impact on protected species; habitats or priority species identified in the borough's Biodiversity Action Plan; and/or is either within or in close proximity to a SINC(s).</p>	
		<p>G) All developments are required to minimise impacts on existing trees, hedges, shrubs and other significant vegetation, and provide sufficient space for the crowns and root systems of existing and proposed trees and their future growth. Developments within proximity of existing trees are required to provide protection from any damage during development. The Council will normally refuse permission or consent for the removal of protected trees, i.e. trees subject to a Tree Preservation Order (TPO) and trees within a conservation area; and for proposals that would have a detrimental impact on the health of protected trees.</p>	
		<p>H) Any loss of or damage to trees or other significant planting, or adverse effects on their growing conditions or survival, will only be permitted where it is demonstrably unavoidable in order to meet other relevant Local Plan policy requirements (as agreed with the Council). In such circumstances, suitable high quality re-provision of equal value must be provided</p>	

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		on-site. Where on-site re-provision is demonstrably not possible (as agreed with the Council), a financial contribution of the full cost of appropriate re-provision will be required.	
<b>G5</b>	<b>Green Roofs and Vertical Greening</b>	<p>A) Developments proposals must use all available roof space to incorporate biodiversity-based extensive green roofs, subject to other planning considerations. Developments involving the extension of existing buildings must seek to retrofit extensive green roofs on existing roof areas where feasible, in addition to providing green roofs on the extension.</p> <p>B) Green roofs must be considered at the earliest possible stage of designing a proposal to ensure their effective operation. They must be designed to:</p> <ul style="list-style-type: none"> <li>i. maximise benefits for biodiversity, sustainable drainage and cooling;</li> <li>ii. promote ecological diversity including planting based on wildflowers and a maximum of 25% sedum planting;</li> <li>iii. have a varied substrate depth of average 80-150mm, unless it can be demonstrated that this is not reasonably possible; and</li> <li>iv. be easily monitored, allowing for an ongoing effective process to inspect and monitor the quality of the green roof.</li> </ul> <p>C) Major development proposals must accommodate surface water storage, where sustainable drainage requirements are applicable in accordance with Policy S9, by incorporating blue roof stormwater attenuation, unless it can be demonstrated that this is not possible.</p> <p>D) Developments proposing the installation of roof level solar panels are required to incorporate the panels over a green roof area to form a 'bio-solar roof', where the overarching biodiversity and drainage functions of the green roof will not be adversely affected.</p> <p>E) Biodiversity-based extensive green roofs are the Council's clear priority in terms of green roof provision. The installation of intensive or semi-intensive green roofs to provide amenity space will only be acceptable where it is clearly demonstrated that this is required to meet other policy requirements, and where the primary biodiversity, sustainable drainage and cooling functions of the green roof will not be adversely affected. Dedicated areas of biodiversity-based planting must be maximised on intensive or semi-intensive green roofs and amenity space must not cover the majority of roof space.</p> <p>F) Major developments are encouraged to consider tree planting and food growing opportunities as part of intensive and semi-intensive green roofs where feasible, and where the additional weight requirements can be supported.</p> <p>G) New-build developments, and all major applications (including those involving refurbishments) must maximise the greening of vertical surfaces as far as reasonably possible. Vertical greening must be designed to:</p> <ul style="list-style-type: none"> <li>i. maximise benefits for biodiversity, sustainable drainage and cooling;</li> <li>ii. avoid excessive water demand and employ a watering system that does not rely on mains water supply or a pumped irrigation supply;</li> </ul>	<p>The Development has sought to maximise the amount of green roofs which can be provided. These have been designed to maximise benefits for biodiversity, sustainable drainage and cooling, promote ecological diversity, have a varied substrate depth and be easily monitored. Solar panels are incorporated over the green roofs to maximise sustainability benefits.</p> <p>The planning application is accompanied by a Flood Risk Assessment (FRA) prepared by Waterman. This confirms that the Site is located in Flood Zone 1 (low risk) and the development will not lead to increased flood risk elsewhere.</p> <p>The development includes significant regrading of land levels and the use of Sustainable Urban Drainage Systems including permeable paving, green roofs and rain gardens which will be fully incorporated into the landscaping design. Further details are provided in the Open Space and Recreation Assessment and Landscape Design Strategy. The development has followed the drainage hierarchy and runoff from the Site is proposed to be restricted to greenfield rates for all events up to and including the 1 in 100 year rainfall event in line with planning policy.</p> <p>Urban Greening has been maximised and the development achieves a score in excess of 0.4. The development also incorporates a number of Sustainable Urban Drainage Systems to manage surface water.</p> <p>Part H of this Draft Policy is not relevant to the development.</p>

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		iii. promote ecological diversity through planting a range of appropriate species and incorporating micro habitats to support Islington's Biodiversity Action Plan, including nesting boxes for birds or bats where possible; iv. provide growing conditions suitable for the selected plant species, and require minimal maintenance; and v. incorporate planting rooted in soil from both ground level and roof level planters where practical. H)	
<b>Chapter 6 – Sustainable Design</b>			
<b>S1</b>	<b>Delivering Sustainable Design</b>	A) The Council will seek to ensure the borough develops in a way that maximises positive effects on the environment and improves quality of life, whilst minimising or avoiding negative impacts. Ensuring sustainable design will reduce fuel poverty, and improve long term energy security for Islington residents and businesses; minimise the contribution of development in Islington to climate change and ensure that developments are designed to mitigate the effects of climate change, in line with the three strategic objectives of the Committee on Climate Change to reduce energy demand, decarbonise heat and decarbonise electricity. B) The Council will promote zero carbon development, with the aim that all buildings in Islington will be net zero carbon by 2050. To ensure that Islington is on the right trajectory to achieve this target, sustainable design must be considered holistically from the start of the design process and all development proposals are required to demonstrate how they will comply with all relevant sustainable design standards and policies during design, construction and operation of the development. C) All development proposals must maximise energy efficiency and minimise on-site greenhouse gas emissions in accordance with the following energy hierarchy: <ul style="list-style-type: none"> <li>• be lean: use less energy and manage demand during operation. Energy demand (both annual and peak) must be minimised as far as possible through consideration of building fabric energy efficiency as an integral part of the design, with a focus on building form and passive design in addition to specification.</li> <li>• be clean: supply energy efficiently and cleanly, and utilise local energy resources (such as heat networks and secondary heat).</li> <li>• be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.</li> <li>• be seen: monitor, verify and report on energy performance.</li> </ul> D) E) The Council will promote the extension of existing heat networks and the delivery of new heat network infrastructure. Heat networks have the potential to contribute significantly to climate change mitigation through the decarbonisation of heat, minimising fuel poverty, and maximising energy resilience.	The Development contributes to the overarching principles of sustainable design and responding to climate change. The development has been designed in accordance with the principles of net zero carbon and this has been a consideration through the design development process. The development proposals follow the London Plan energy hierarchy and the submitted Energy Statement demonstrates how the Development aims to achieve zero-carbon targets, with a minimum on-site that exceeds the required reduction of at least 35% beyond Building Regulations. This part of the draft policy is not relevant. The Development is designed to facilitate a future connection to a District Heat Network.

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		<p>F) All development proposals are required to adopt an integrated approach to water management which considers flood risk, sustainable drainage, water efficiency, water quality and biodiversity. All development proposals will be expected to reduce water demand and meet best practice water efficiency targets.</p> <p>G) The Council will promote a circular economy approach to design and construction to keep products and materials in use for as long as possible and to minimise construction waste. A central part of this is ensuring developments are designed to be flexible and adaptable to changing requirements and circumstances over their lifetime.</p> <p>H) All new development must be designed, constructed and operated to limit contribution to air pollution and to improve air quality as far as possible, as well as reducing exposure to poor air quality, especially among vulnerable people.</p>	<p>The development adopts an integrated approach to water management through the use of SUDS.</p> <p>The Development has been designed in accordance with the principles of the Circular Economy and the planning application is accompanied by a Circular Economy Statement to demonstrate this.</p> <p>An Air Quality Assessment forms part of the submitted Environmental Statement.</p>
<b>S2</b>	<b>Sustainable Design and Construction</b>	<p>A) All development proposals are required to submit a Sustainable Design and Construction Statement which must demonstrate that the proposal meets all relevant sustainable design policies. The Sustainable Design and Construction Statement must show how sustainable design has been considered holistically from the start of the design process and is integrated throughout the construction and operation of the development.</p> <p>B) The Sustainable Design and Construction Statement submitted by all major developments, minor new build developments, and larger minor extensions must include the following details:</p> <ul style="list-style-type: none"> <li>i. Energy Strategy - demonstrate how the net zero carbon target will be met within the framework of the energy hierarchy and justify the heat source selection in accordance with the heating hierarchy. For detailed requirements see Policy S4: Minimising greenhouse gas emissions; and Policy S5: Energy Infrastructure.</li> <li>ii. Adaptive Design Strategy – demonstrate how the application addresses circular economy principles, including the impact and efficiency of construction materials, and how the development has been designed to adapt to change. For detailed requirements see Policy S10: Circular Economy and Adaptive Design.</li> <li>iii. Landscape Design Strategy – demonstrate an integrated approach to hard and soft landscape design which maximises urban greening, soft landscaping, biodiversity and sustainable drainage, including the incorporation of SUDS into the landscape design. For detailed requirements see Policy G4: Biodiversity, landscape design and trees.</li> <li>iv. Integrated Water Management and Sustainable Drainage – demonstrate an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically. Major developments must submit a Surface Water Drainage Pro-forma to ensure surface water drainage proposals meet the drainage requirements. For detailed requirements see Policy S9: Integrated Water Management and Sustainable Drainage.</li> <li>v. Operational sustainability – demonstrate how the development will be designed to facilitate ongoing effective and sustainable use, management and maintenance. For</li> </ul>	<p>The planning application is accompanied by a Sustainable Design and Construction Statement.</p> <p>The Sustainable Design and Construction Statement seeks to respond to Draft Policy S2 Part B.</p>

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		<p>detailed requirements see Policy S4 Minimising greenhouse gas emissions and Policy S6: Managing Heat Risk.</p> <p>vi. Air Quality - demonstrate how the development will be designed, constructed and operated to limit its contribution to air pollution, improve local air quality, and reduce exposure to poor air quality, especially for vulnerable people. For detailed requirements see Policy S7: Improving air quality.</p> <p>C) The Sustainable Design and Construction Statement submitted by smaller minor extensions and minor changes of use must demonstrate that all relevant sustainable design requirements have been considered. The level of information provided in the statement must be proportionate to these requirements.</p> <p>D) Developments are required to support monitoring of the implementation of the Sustainable Design and Construction Statement, including through the Green Performance Plan (where relevant) and other submitted sustainable design details, by:</p> <ul style="list-style-type: none"> <li>i. allowing Council officers access to the development;</li> <li>ii. submitting information to the Council when requested; and</li> <li>iii. where necessary, through payment of a reasonable monitoring fee set by the Council.</li> </ul>	<p></p> <p>This part of the draft policy is not relevant.</p> <p>The Development will support monitoring of the implementation of the Sustainable Design and Construction Statement through the Green Performance Plan in accordance with the Council's adopted S106 Obligations SPD.</p>
<b>S3</b>	<b>Sustainable Design Standards</b>	<p>A)</p> <p>B) Major and minor new-build residential developments must achieve a four-star rating (as a minimum) under the BRE Home Quality Mark scheme.</p> <p>C) All non-residential and mixed-use developments proposing 500sqm or more net additional floorspace are required to achieve a final (post-construction stage) certified rating of Excellent as part of a fully fitted assessment within BREEAM New Construction 2018 (or equivalent scheme), and must make reasonable endeavours to achieve an Outstanding rating. A 'verification stage' certification at post occupancy stage must also be achieved, unless it can be demonstrated that this is not feasible.</p> <p>D)</p> <p>E) All developments assessed under BREEAM New Construction 2018 (as required by Part C) and Non-Domestic Refurbishment and Fit-out schemes (as required by Part D) are required to score the following minimum 'credits', in addition to the minimum acceptable requirements for a BREEAM excellent rating:</p> <ul style="list-style-type: none"> <li>i. At least 50% of credits on Environmental impacts from construction products (Mat 01);</li> <li>ii. At least 1 credit on Responsible sourcing of materials (Mat 03), in addition Criterion E(i);</li> <li>iii. At least 50% of credits on Construction waste management (Wst 01);</li> <li>iv. All credits on Water consumption (Wat 01), or a minimum of 3 credits where rainwater and/or greywater recycling is demonstrated not to be feasible;</li> <li>v. The second credit on energy monitoring (Ene 02 – Sub-metering of high energy load and tenancy areas), where feasible;</li> </ul>	<p>The Sustainable Design and Construction Statement seeks to respond to Draft Policy S3. The Development is targetting achieving a BREEAM 'Excellent' rating.</p> <p>Part A, D, F, and G of the Draft Policy are not relevant to the development.</p>

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		<ul style="list-style-type: none"> <li>vi. Reasonable endeavours must be made to achieve two credits under the Ene 01 exemplary level criteria, in order to demonstrate zero carbon development; and</li> <li>vii. BREEAM New Construction only - all 4 credits for Energy modelling and reporting as part of Reduction of energy use and carbon emissions (Ene 01).</li> </ul>	
		F)	
		G)	
<b>S4</b>	<b>Minimisng Greenhous e Gas Emissions</b>	<p>A) All development proposals are required to demonstrate how greenhouse gas emissions will be reduced in accordance with the energy hierarchy (set out in Policy S1) as part of the SDCS. Major developments, minor new build developments, and larger minor extensions must provide a more detailed energy assessment as part of the SDCS.</p> <p>B) Until the end of 2021, major residential developments and minor new-build residential developments of one unit or more are required to comply with the interim' Fabric Energy Efficiency Standard (FEES), as defined by the Zero Carbon Hub. 'Full' FEES will apply from the start of 2022 onwards</p> <p>C) All major developments and minor new-build residential developments of one unit or more must be net zero carbon. These developments must demonstrate, as part of the SDCS, how the net zero carbon target will be met within the framework of the energy hierarchy.</p> <p>D) The following on-site reductions in carbon emissions are required in accordance with the energy hierarchy:</p> <ul style="list-style-type: none"> <li>i. Major developments must achieve a minimum on-site reduction in total (regulated and unregulated) emissions of at least 27 per cent beyond Part L of the Building Regulations.</li> <li>ii. Major developments able to connect to an existing heat network must achieve a minimum on-site reduction in total (regulated and unregulated) emissions of at least 39 per cent beyond Part L of the Building Regulations.</li> <li>iii. Minor new-build residential developments of one unit or more must achieve a minimum on-site reduction in regulated emissions of at least 19% beyond Part L of the Building Regulations, unless it can be demonstrated that such provision is not feasible.</li> </ul> <p>E) In addition to meeting the minimum on-site reduction targets in Part D, all major development proposals must calculate whole life-cycle carbon emissions through a nationally recognised whole life-cycle carbon assessment and demonstrate actions taken to reduce life-cycle carbon emissions.</p>	<p>The development proposals follow the London Plan energy hierarchy and the submitted Energy Statement demonstrates how the Development aims to achieve zero-carbon targets, with a minimum on-site that exceeds the required reduction of at least 35% beyond Building Regulations.</p> <p>The Sustainable Design and Construction Statement provides details on the dwelling and target fabric energy efficiency standard.</p> <p>As above, the development proposals follow the London Plan energy hierarchy and the submitted Energy Statement demonstrates how the Development aims to achieve zero-carbon targets, with a minimum on-site that exceeds the required reduction of at least 35% beyond Building Regulations.</p> <p>The development proposals follow the London Plan energy hierarchy and the submitted Energy Statement demonstrates how the Development aims to achieve zero-carbon targets, with a minimum on-site that exceeds the required reduction of at least 35% beyond Building Regulations.</p> <p>The planning application is accompanied by a Whole Life-Cycle Carbon Assessment.</p>



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		<p>F) All developments are required to reduce energy demand through energy efficiency measures in the first instance, in accordance with the energy hierarchy. Major developments are required to achieve the following reductions in demand as part of achieving the overall reduction targets in Part D of this policy:</p> <ul style="list-style-type: none"> <li>i. Major non-residential development must achieve at least 15 per cent out of the overall reduction target through energy efficiency measures in order to reduce energy demand.</li> <li>ii. Major residential development must achieve at least 10 per cent out of the overall reduction target through energy efficiency measures in order to reduce energy demand.</li> </ul> <p>G) Where it is clearly demonstrated that the zero carbon target cannot be fully achieved on-site, any shortfall must be provided through a cash in lieu contribution to Islington's carbon offset fund. All major developments and minor new build developments of one unit or more will be required to pay the full cost of offsetting the remaining regulated emissions, unless it can be demonstrated that this is not viable, in which case the maximum viable payment for offsetting will be required based on a viability assessment. Such payments will be secured through a legal agreement.</p> <p>H)</p> <p>I) Major developments must submit a Green Performance Plan (GPP) detailing the actual measurable outputs for the occupied building in relation to energy consumption and carbon emissions, based on the commitments in the SDCS.</p> <p>J) The SDCS - and where appropriate, GPP - for all major developments must include the following information in order to maximise fabric energy efficiency, reduce the performance gap and provide more accurate information to design teams:</p> <ul style="list-style-type: none"> <li>i. An assessment of predicted future energy use based on PHPP for residential and low energy non-domestic buildings; and CIBSE TM54 for non-domestic buildings (or any equivalent methodology), rather than Part L only assessments. Predicted energy use must be declared in kWh/m2/yr and kWh/yr and this will become one of the GPP indicator targets in the future.</li> <li>ii. Confirm the actual performance values achieved in comparison to the original energy targets stated in the SDCS, and to submit the associated evidence including site photographs of insulation installation and the construction manager's declaration. This information must be submitted to the Council prior to occupancy as part of the final GPP.</li> <li>iii. Carry out an air tightness test and thermographic survey. The test reports, along with details of any remediation measures, must be provided to the Council prior to occupancy as part of the final GPP.</li> </ul>	<p>A series of energy efficiency measures are incorporated as detailed within the accompanying Sustainable Design and Construction Statement.</p> <p>A financial contribution towards carbon offsetting will be secured as part of the s106 legal agreement.</p> <p>This part of the draft policy is not relevant.</p> <p>The planning application is accompanied by a Green Performance Plan, appended to the Sustainable Design and Construction Statement.</p> <p>The planning application is accompanied by a Sustainable Design and Construction Statement and Green Performance Plan which responds to this part of draft policy.</p>
<b>S5</b>	<b>Energy Infrastructure</b>	<p>A) All major developments are required to have a communal low-temperature heating system. Heating systems must have a maximum annual carbon content of heat of less than 280 gCO<sub>2</sub>/kWh, calculated using the carbon emissions factor for grid electricity from the most recently available BEIS energy projections (UEPs) for the first 25 years of operation of the</p>	<p>The application is accompanied by an Energy Assessment, within the Sustainable Design and Construction Statement.</p>



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		<p>building. The heat source for the communal heating system must be selected in accordance with the following heating hierarchy:</p> <ol style="list-style-type: none"> <li>1. connect to local existing or planned heat networks (subject to parts F and G below)</li> <li>2. use zero-emission or local secondary heat sources (in conjunction with heat pump, if required).</li> <li>3. use low-emission CHP (only where there is a case for CHP to enable the delivery of an area-wide heat network).</li> <li>4. use ultra-low NOx gas boilers.</li> </ol>	<p>There are no existing or planned networks within 500m of the Site.</p>
		<p>B) CHP and ultra-low NOx gas boiler communal or heat network systems (numbers 3 and 4 in the heating hierarchy set out in Part A) must be designed to ensure that they meet the requirements of Policy S7.</p>	<p>The Holloway Prison Site SPD states the heating network should explore opportunities to share heat with neighbouring buildings through providing additional capacity as well as potential connection to DE networks in the wider area (including the Holloway Road and Highbury West clusters). Notwithstanding this, the development does include a connection to a future district heat network.</p>
		<p>C)</p>	<p>LBI identified a series of neighbouring developments during the course of pre-application discussions. These developments were reviewed by the consultant team and it was determined that it is not reasonably possible to develop and/or connect to a Shared Heating Network (SHN) linking to any of these developments to the Site. Further detail regarding the review is set out in the Sustainable Design and Construction Statement which accompanies the application.</p>
		<p>D)</p>	<p>Therefore, it is not considered to be reasonable for the Holloway Prison Site to deliver a Shared Heating Network.</p>
		<p>E) As part of the SDCS, all major developments must demonstrate that they have assessed the feasibility of heat network connection (including a Shared Heat Network) or other appropriate heat sources, in accordance with the heating hierarchy, in order to ensure low and zero carbon heating options are prioritised. Larger minor developments that are able to connect to a heat network under Part G must assess the feasibility of connection as part of the SDCS.</p>	<p>Part C and D of the Draft Policy are not relevant to the development.</p>
		<p>F) Major developments located within 500 metres of an existing heat network, and larger minor new-build developments located within 50 metres, must be designed to connect to that network at the time of construction, including provision of the means to connect to that network and a reasonable financial contribution to the connection charge, unless a feasibility assessment demonstrates that connection is not reasonably possible. An existing heat network includes a planned network that will be in existence by the anticipated time of practical completion.</p>	
		<p>G) Major developments located within 500 metres of a planned future heat network, which is considered by the Council likely to be operational within 3 years of a grant of planning permission must be designed to be able to connect to that network in the future. Developers are required to commit to connection and contribute to the cost of connection via a legal agreement, unless a feasibility assessment demonstrates that connection is not reasonably possible.</p>	
		<p>H) Where connection to an existing or future heat network is not possible, major developments must develop and/or connect to a low or zero carbon Shared Heating Network (SHN) linking neighbouring developments and/or existing buildings, unless it can be demonstrated that this is not reasonably possible.</p>	
		<p>I) Where connection to an existing or future heat network is deemed possible under parts G and H above, major developments are required to provide a preferred energy strategy and an alternative energy strategy (as part of the SDCS). The preferred energy strategy should be enacted based on connection to a heat network. In cases where it is not reasonably</p>	

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		<p>possible to connect to a heat network the alternative energy strategy should be enacted and the heat source will be selected in accordance with the heating hierarchy. Minor developments that are able to connect to a heat network are required to provide details of the connection as part of the SDCS.</p> <p>J) The Council will support the development of heat networks and energy centres in principle, subject to meeting wider policy requirements, including on design and air quality.</p> <p>K) The SDCS should set out a strategy for how the development will be future-proofed to achieve zero carbon emissions on-site by 2050. Where the development is able to connect to a heat network, the SDCS must demonstrate how the heat network will be future-proofed to achieve zero carbon and the timeline for achieving this.</p>	
<b>S6</b>	<b>Managing Heat Risk</b>	<p>A) Development proposals must minimise internal heat gain and the impacts of the 'urban heat island effect' through design, layout, orientation and materials.</p> <p>B) All developments (excluding smaller minor extensions) must demonstrate, as part of the SDCS, how the proposed design will reduce the potential for overheating and reliance on air conditioning systems, and maximise the incorporation of passive design measures in accordance with the following cooling hierarchy:</p> <ol style="list-style-type: none"> <li>1. minimise internal heat generation through energy efficient design</li> <li>2. reduce the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation and the provision of green roofs and walls</li> <li>3. manage the heat within the building through exposed internal thermal mass and high ceilings</li> <li>4. provide passive ventilation, such as cross ventilation.</li> <li>5. provide low energy mechanical ventilation</li> </ol> <p>C) Use of technologies from lower levels of the hierarchy will not be supported unless evidence is provided to demonstrate that technologies from higher levels of the hierarchy cannot deliver sufficient heat control.</p> <p>D) Major developments are required to include details of internal temperature modelling under projected increased future summer temperatures, to demonstrate that the risk of overheating has been addressed as part of the SDCS.</p> <p>E)</p>	<p>Detail of how the development manages heat risk is included within Sustainable Design and Construction Statement and Design and Access Statement.</p> <p>Part E of this Draft Policy is not relevant to the development.</p>
<b>S7</b>	<b>Improving Air Quality</b>	<p>A) All development proposals must mitigate or prevent adverse impacts on air quality, and investigate and implement all reasonable opportunities to improve air quality. Development proposals will be refused where they would:</p> <ol style="list-style-type: none"> <li>i. cause significant harm to air quality, cumulatively or individually;</li> <li>ii. lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;</li> <li>iii. reduce any air quality benefits that result from active measures/activities which seek to improve air quality; or</li> <li>iv. create unacceptable risk of high levels of exposure to poor air quality</li> </ol>	<p>The application is accompanied by an Air Quality Assessment within the Environmental Statement.</p> <p>Part C of this Draft Policy is not relevant to the development.</p>

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		<p>B) Major developments, minor new build developments, and larger minor extensions must be at least Air Quality Neutral through provision of on-site measures. Such developments are required to submit an Air Quality Assessment (AQA) as part of the SDCS; the level of detail of the AQA must be proportionate to the scale of development, but must include details of how Air Quality Neutral will be achieved. A preliminary AQA must be carried out before designing the development, to inform the design process.</p> <p>C)</p> <p>D) Developments in excess of 200 net additional residential units or 10,000sqm net additional gross external floorspace must be Air Quality Positive and implement measures on-site to actively reduce air pollution as far as possible.</p> <p>E) Measures to address air quality implemented in line with relevant requirements in Parts A to D must be implemented through on-site design solutions, to prevent or minimise increased exposure to existing air pollution and make provision to address local air quality issues. Particular care must be taken with developments that are in Air Quality Focus Areas (AQFAs) or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people. Where adequate mitigation is not provided, planning permission may be refused.</p> <p>F) Where it can be demonstrated that on-site measures are impractical or inappropriate, off-site measures to improve local air quality may be acceptable, provided that at least equivalent air quality benefits can be demonstrated.</p>	
<b>S8</b>	<b>Flood Risk Management</b>	<p>A) A site specific Flood Risk Assessment (FRA) will be required for:</p> <ul style="list-style-type: none"> <li>i. proposals on sites of 1 hectare or greater;</li> <li>ii. new development proposing more than 100sqm increase in floorspace in a critical drainage area;</li> <li>iii. proposals involving a change of use in development type to a more vulnerable class;</li> <li>iv. 'Highly Vulnerable' development located in an area of High or Medium surface water flood risk; and/or</li> <li>v. 'More Vulnerable' development located in an area of High surface water flood risk.</li> </ul> <p>B) The site-specific FRA must assess in detail the risk of flooding to and from a development, from all sources but focusing particularly on surface water flooding, taking climate change projections into account. Where a development is located within a Critical Drainage Area (CDA) or Local Flood Risk Zone (LFRZ), or where the site includes a 'High' surface water flood risk area, the site-specific FRA must give particular consideration to extent and impacts of flood risk.</p> <p>C) Groundwater flooding must be investigated in detail as part of the site-specific FRA where development is located in an area identified as having potential for groundwater flooding.</p> <p>D) As part of the site-specific FRA, development proposals must:</p> <ul style="list-style-type: none"> <li>i. carry out a Sequential Test in order to ensure that the vulnerability classification of the development is appropriate to the level of flood risk; and</li> </ul>	<p>The Site exceeds 1 hectare and therefore the planning application is accompanied by a Flood Risk Assessment (FRA) prepared by Waterman.</p> <p>The planning application is accompanied by a Flood Risk Assessment (FRA) prepared by Waterman. This confirms that the Site is located in Flood Zone 1 (low risk) and the development will not lead to increased flood risk elsewhere.</p> <p>The development includes significant regrading of land levels and the use of Sustainable Urban Drainage Systems including permeable paving, green roofs and rain gardens which will be fully incorporated into the landscaping design. Further details are provided in the Open Space and Recreation Assessment and Landscape Design Strategy. The development has followed the drainage hierarchy and runoff from the Site is</p>

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		<p>ii. demonstrate a sequential approach to development layout within the development site, in order to ensure that the most vulnerable elements or land uses within a development are located in the lowest risk parts of the site.</p> <p>E) The site-specific FRA must demonstrate how flood risk will be managed and mitigated to ensure the development is safe from flooding and the impacts of climate change for its lifetime. This must include assessment of appropriate flood proof design and construction methods, and SUDS.</p> <p>F) 'Highly Vulnerable' development, including basement dwellings, proposed in 'High' surface water flood risk areas, and/or where there is potential for groundwater flooding of property situated below ground level or potential for groundwater flooding to occur at surface, are required to incorporate appropriate flood proof construction methods in order to mitigate the risk of flooding. Essential infrastructure associated with developments in 'High' surface water flood risk areas must be located above ground floor level, where possible.</p>	<p>proposed to be restricted to greenfield rates for all events up to and including the 1 in 100 year rainfall event in line with planning policy.</p>
<b>S9</b>	<b>Integrated Water Management and Sustainable Drainage</b>	<p>A) All development proposals must adopt an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site and in the context of links with wider-than-site level plans. Water management must be considered as early as possible in the design process.</p> <p>B) All development proposals must ensure that surface water run-off is managed as close to its source as possible in line with the London Plan drainage hierarchy (repeated below), with priority given to green features over grey features:</p> <ol style="list-style-type: none"> <li>1. rainwater use as a resource (for example rainwater harvesting, blue roofs).</li> <li>2. rainwater infiltration to ground at or close to source.</li> <li>3. rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens).</li> <li>4. rainwater discharge direct to a watercourse (unless not appropriate).</li> <li>5. controlled rainwater discharge to a surface water sewer or drain.</li> <li>6. controlled rainwater discharge to a combined sewer.</li> </ol> <p>C) Development proposals for impermeable paving will be resisted, including on small surfaces such as front gardens and driveways, unless they can demonstrate that the level of run-off will not exacerbate flood risk in the area, both direct and cumulative risk.</p> <p>D) Drainage must be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.</p> <p>E) All developments are required to demonstrate that appropriate SUDS have been implemented in accordance with the drainage hierarchy to ensure that surface water runoff rates and volumes entering open space are predictable and water at the surface is clean and safe. All developments must identify how the initial run off from a site following a rainfall event will be dealt with; and demonstrate that an appropriate maintenance plan will be put place providing details of how the SUDS will be maintained after implementation to ensure their continued effectiveness.</p>	<p>The planning application is accompanied by a Flood Risk Assessment (FRA) prepared by Waterman. This confirms that the Site is located in Flood Zone 1 (low risk) and the development will not lead to increased flood risk elsewhere.</p> <p>The development includes significant regrading of land levels and the use of Sustainable Urban Drainage Systems including permeable paving, green roofs and rain gardens which will be fully incorporated into the landscaping design. Further detail are provided in the Open Space and Recreation Assessment and Landscape Design Strategy.</p> <p>The development has followed the drainage hierarchy and runoff from the Site is proposed to be restricted to greenfield rates for all events up to and including the 1 in 100 year rainfall event in line with planning policy.</p> <p>The FRA includes the Surface Water Drainage Proforma.</p> <p>This planning application is accompanied by a series of Contaminated Land Assessments prepared by Waterman.</p>

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		<p>F) Major developments creating new floorspace, and major changes of use that will result in an intensification of water use, must be designed to achieve the following standards:</p> <ul style="list-style-type: none"> <li>i. Surface water flows from the site must be reduced to a greenfield run-off rate (8 litres/second/hectare for Islington), where feasible. Where it is demonstrated that achieving a greenfield run-off rate is not feasible due to the site conditions, runoff rates must be minimised to as close to the greenfield rate as possible.</li> <li>ii. The volume of run-off that must be stored on-site must be calculated based on the nationally agreed return period value of a 1 in 100-year storm event plus a 40% allowance for climate change for the worst storm duration. Where the site-specific FRA indicates that an additional volume of run-off must be stored above and beyond the amount calculated based on the method above, this must be provided on site.</li> </ul>	<p>Part I, L, and Q are not relevant to the development.</p>
		<p>G) Major developments involving works to an existing building should reduce run-off rates for the site as a whole, rather than focusing solely on new buildings.</p>	
		<p>H) All major developments must submit a Surface Water Drainage Pro-forma to ensure surface water drainage proposals meet policy requirements.</p>	
		<p>I)</p>	
		<p>J) SUDS must be designed and implemented as a central part of the SDCS, using an integrated approach which maximises biodiversity and water use efficiency alongside other benefits including, where appropriate and practical, amenity and recreation. All developments must maximise areas of soft landscaping and other permeable surfaces to support this, in accordance with Policy G4</p>	
		<p>K) All developments must demonstrate that they have minimised the use of mains water and have been designed to be water efficient, through the SDCS. Water use must be minimised as part of all developments by reducing water demand in the first instance through the installation of water efficient fittings and appliances, and the use of water saving measures. Developments must use smart metering, and retrofitting of water efficiency measures is encouraged where feasible.</p>	
		<p>L)</p>	
		<p>M) Residential development must minimise water consumption in accordance with the Optional Requirement of the Building Regulations, achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption). Non-residential developments, including refurbishments, must minimise water consumption by achieving all credits on Water consumption (Wat 01) under the relevant BREEAM scheme, in accordance with the requirements of Parts E and G of Policy S3.</p>	
		<p>N) Major developments and/or developments with high/intense water usage - including hotels, hostels, and student housing - are required to incorporate a rainwater and greywater recycling system. Minor developments must incorporate rainwater recycling, where feasible and practical</p>	
		<p>O) The development of land affected by contamination must not create unacceptable risks to human health and the wider environment, including local water resources. Assessment and</p>	

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		<p>remediation of any contaminated land must be carried out before any development commences on site.</p> <p>P) All developments are required to protect water quality and demonstrate that there will be no negative impacts on the quality of local water resources as a result of the development. All developments must assess and mitigate any potential impact on groundwater; only appropriate land uses should be located within groundwater Source Protection Zones (SPZs).</p> <p>Q)</p>	
<b>S10</b>	<b>Circular Economy and Adaptive Design</b>	<p>A) All developments must adopt a circular economy approach to building design and construction in order to keep products and materials in use for as long as possible and to minimise construction waste.</p> <p>B) Buildings must be made from components and materials that can be re-used or recycled. Building design must enable deconstruction to ensure the maximum value of building components can be recovered and re-used at the end of the building's life. Where demolition and remediation works are necessary, materials must be re-used and/or recycled.</p> <p>C) A minimum 10% of the total value of materials used in the construction of both major and minor developments must derive from recycled and re-used content in the products and materials selected.</p> <p>D) All developments must be designed to be flexible and adaptable to changing requirements and circumstances over their lifetime; including changes to the physical environment, market demands and land use.</p> <p>E) All major developments (including refurbishment and redevelopment of existing buildings), minor new build developments, and larger minor extensions are required to provide an Adaptive Design Strategy as part of the SDCS. This must demonstrate how a circular economy approach has been adopted as part of the building design and construction, and how the building will adapt to change over its lifetime. The Strategy must include evidence to demonstrate that the development will be designed and constructed to:</p> <ul style="list-style-type: none"> <li>i. last as long as possible and suit its anticipated lifespan – the strategy must specify the intended overall design life of all buildings in the development;</li> <li>ii. avoid construction waste and the unnecessary demolition of structures;</li> <li>iii. be built in layers to allow elements of buildings to be replaced overtime, supporting a modular design;</li> <li>iv. be adaptable – the plan form, layout and structure enables the building to be adapted to respond to change and/or adapted for various uses throughout its life;</li> <li>v. enable ease of deconstruction - building materials, components and products can be disassembled and re-used at the end of their useful life; and</li> <li>vi. maximise the re-use and/or recycling of all materials arising from demolition and remediation works.</li> </ul> <p>F) All development must minimise the environmental impact of materials through the use of sustainably-sourced, low impact and recycled materials, using local supplies where feasible.</p>	<p>The development seeks to promote circular economy outcomes and the application is accompanied by a Circular Economy Statement.</p> <p>A pre-demolition audit will be undertaken on the existing site to assess the possibility for deconstruction and re-use / reclamation of existing materials.</p> <p>As per the Circular Economy Statement, the development seeks to use a minimum recycled and re-used products and materials which accords with the Draft Policy.</p> <p>The development has been designed to be flexible and adaptable to changing requirements and circumstances over the lifetime.</p> <p>The application is accompanied by an Sustainable Design and Construction Statement which includes an Adaptive Design Strategy.</p> <p>Indicative materials are shown in the Design and Access Statement.</p>



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		G) All developments are required to minimise the impact of construction on the environment and comply with Islington's Code of Practice for Construction Sites.	The development will minimise the impact of construction on the environment and comply with Islington's Code of Practice for Construction Sites.
<b>Chapter 7 – Public Realm and Transport</b>			
<b>T1</b>	<b>Enhancing the Public Realm and Sustainable Transport</b>	<p>A) A coherent and inclusive public realm, in conjunction with effective transport, are key elements of ensuring delivery of the Local Plan objectives. All development proposals must take into account the link between land use, transport accessibility and connectivity, and promoting journeys by physically active means, like walking or cycling (known as active travel). Applicants must provide appropriate information to allow proper assessment of transport impacts and show how these impacts can be addressed, as set out in Appendix 3.</p> <p>B) The design of developments, including building design and internal layout, site layout, public realm and the provision of transport infrastructure, must prioritise practical, safe and convenient access and use by sustainable transport modes, namely walking, cycling and public transport. Private vehicle use will be restricted in Islington as far as possible, as it is not sustainable and is a key cause of emissions and congestion.</p> <p>C) Freight, logistics and delivery vehicles may be acceptable forms of vehicular transport to enable the functioning of development where appropriate, according to the principles and requirements set out in this policy.</p> <p>D) All new development will be car-free, which will contribute to the strategic aim for a modal shift to sustainable transport modes. Private motor vehicles, including electric vehicles, motorcycles and taxis, will not be accommodated as part of new development in the borough and are not a priority form of transport.</p> <p>E) Transport developments are encouraged to adopt a design-led approach to recognise the role of streets as places.</p>	The Development has been designed in accordance with the Healthy Streets principles, primarily to reduce the reliance on travel by car and encourage the use of sustainable travel modes, by foot, cycle and public transport. A qualitative Healthy Streets audit has been undertaken for the proposed public realm design within the Site, in accordance with the TfL guidance. As such, the development is car-free apart from the provision of limited disabled parking. The Site is highly accessible by non-car modes of travel, including on foot, by cycle and by public transport, and the Site has a PTAL score of 6a ('excellent'). The Development seeks to create an attractive public realm by creating new access points to the Site, car-free routes through the Site, sitting areas, play space and a central garden space as well as potential improvements to the pedestrian crossing on Parkhurst Road / Camden Road.
<b>T2</b>	<b>Sustainable Transport Choices</b>	<p>A) Development proposals must demonstrate that negative impacts on the safe and efficient operation of sustainable transport infrastructure – e.g. the public realm, cycle lanes, bus routes/stops - are mitigated/prevented.</p> <p>B) All pedestrian and cycling infrastructure and facilities are required to be designed in accordance with relevant guidance and/or best practice standards.</p> <p>C) The use of shared space to jointly meet the needs of motorised traffic, walking and cycling will be resisted where it involves a single surface. Shared spaces may be acceptable where it has been demonstrated that they deliver logical, legible, inclusive and safe environments that respond to their context.</p> <p><b>Walking</b></p> <p>D) All new developments in the borough must be designed to incentivise walking by:</p> <ol style="list-style-type: none"> <li>i. delivering high quality public realm improvements that are secure, safe, legible, inclusive and create permeable environments;</li> <li>ii. resisting proposals that have a negative effect on public realm;</li> <li>iii. ensuring that pedestrian crossings are convenient and avoiding (where appropriate) complex and/or long pedestrian crossing and unnecessary pedestrian guardrails; and</li> </ol>	<p>The planning application is accompanied by a Transport Assessment, which considers the impacts of the development on the capacity of the highway network at the local, network-wide and strategic level, including mitigation measures where necessary. The development seeks to incentivise walking and cycling by improving the public realm and pedestrian environment which will be designed in accordance with relevant guidance including LCDS guidance.</p> <p>The development seeks to connect to the existing and proposed cycle routes within the vicinity of the Site. In addition, the development includes a number of public realm improvements, such as creating new access points to the Site and car-free</p>

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		<p>iv. ensuring safe, convenient and continuous routes for pedestrians that follow desire lines and form networks.</p> <p><b>Cycling</b>  E) All new developments in the borough must be designed to incentivise cycling by:</p> <ul style="list-style-type: none"> <li>i. ensuring safe, convenient and continuous routes for cyclists that follow desire lines and form networks;</li> <li>ii. demonstrating that there are no road safety conflicts between pedestrians, cyclists and vehicles entering, parking and/or servicing the development. Cyclist entrances to buildings, cycle stores and parking must be safe and convenient for all and cycle lanes must be demarcated from other pedestrian and road traffic;</li> <li>iii. providing cycle parking and associated circulation space for ease of use of cycle parking, in accordance with Appendix 4; and</li> <li>iv. providing inclusive and accessible end-of-trip facilities for cyclists, at a level proportionate to the size of the development and the required level of cycle parking.</li> </ul> <p><b>Public Transport</b>  F) The Council will work in partnership with TfL, the bus and rail operators, developers and other relevant agencies/stakeholders in order to:</p> <ul style="list-style-type: none"> <li>i. implement measures to give buses priority over other private motor vehicles (including continuous bus priority measures along whole route corridors);</li> <li>ii. create and enhance the public realm around bus and rail stations to improve pedestrian/public transport user and cycling experience;</li> <li>iii. ensure network infrastructure and service improvements increase access (including step free access), capacity and public transport interchange improvements to local bus, rail and tube stations;</li> <li>iv. develop the network of services to meet the travel needs of local residents and businesses; and</li> <li>v. ensure that bus stops and bus stopping areas are well located and designed, accessible and comfortable for all.</li> </ul> <p>G)</p>	<p>routes through the Site, which will enhance connectivity, permeability and environment for cyclists.</p> <p>The development will provide cycle parking provision for all uses in line with the standards required in the London Plan and includes provision for larger cycles, including adapted cycles for disabled people. The cycle parking proposed will be designed and laid out in accordance with the London Cycling Design Standards.</p> <p>For the residential element, 80 per cent of cycle parking is two-tier cycle parking whilst 20 per cent is accessible cycle parking for people with non-standard bicycles and those that struggle to use two-tier systems. Of these, 75 per cent will be Sheffield stands and 25 per cent will be Sheffield stands with increased space (i.e. for cargo bikes, hand cranked bikes, trailers, buggies, tandems and tricycles). The accessible cycle parking spaces will be conveniently located to the building entrances. The short stay cycle parking for all uses will be provided within the public realm in the form of Sheffield stands. Further detail of the specification of racks and access will be included within the Transport Assessment which accompanies the planning application.</p> <p>Part G of the Draft Policy is not relevant to the development.</p>
<b>T3</b>	<b>Car-free Development</b>	<p>A) All new development will be car free.</p> <p>Residential Parking (including C3 and non-C3 residential use)</p> <p>B) Vehicle parking or waiting will not be permitted for new homes, except for essential drop-off and accessible parking. This includes applications for vehicle parking within a site, the planning unit and/or within the curtilage of existing residential properties, including any undercroft or basement parking. Unless exceptional circumstances can be demonstrated, no parking permits will be issued to occupiers of these new homes.</p> <p>Non-Residential Parking</p>	<p>Given Site's highly accessible location, the development will be car-free apart 30 disabled parking spaces for Blue Badge holders which will be provided on site, as on-street parking along the internal road.</p> <p>As set out within the Transport Assessment, a Transport Classification of Londoners (TCoL)</p>



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		<p>C) Parking will only be allowed for non-residential developments where this is essential for operational requirements and therefore integral to the nature of the business or service (e.g. Use Class B8 storage and distribution uses). In such cases, parking will only be permitted where an essential need has been demonstrated to the satisfaction of the Council and where the provision of parking would not conflict with other Council policies. Normal staff parking will not be considered essential and will not be permitted.</p>	<p>demographic assessment has been undertaken for the development which suggests the future residents are most likely to comprise 'students and graduates', 'educational advantage' and 'urban mobility', each of which has a 'well below average' or 'below average' car use. Moreover, an assessment of valid Blue Badge permits within the borough has been undertaken, which confirmed that 3.2% of the population had permits within LBI. However, this does not take into consideration the likely demographic of the development. As such, it is considered that the proposed 3% disabled car parking space provision is suitable for the development in this location, given the highly accessible nature of the Site and the likely future demographic. The level of Blue Badge car parking proposed has been agreed with TfL.</p> <p>With respect to additional parking spaces, to provide up to 10% of residential units with a Blue Badge parking space, Peabody has agreed to a financial contribution of £2,000 per space not provided on-site. This accords with LBI's Planning Obligations (Section 106) SPD (2016).</p>
		<p>D) Essential drop-off or essential operational parking considered acceptable in line with Parts B or C must:</p> <ul style="list-style-type: none"> <li>i. be off-street and located to be accessible and convenient in relation to the development;</li> <li>ii. not impede pedestrian and cycle movements;</li> <li>iii. provide an accessible route from the parking space to the development; and</li> <li>iv. provide electric vehicle charging points.</li> </ul>	
		<p>E) Where on-street drop-off or other essential parking is proposed, details must be submitted to demonstrate the need for on-street provision and to show that arrangements will be safe and will not cause a traffic obstruction or nuisance. Electric vehicle charging points must be provided where parking is justified; charging points must be located within the parking space or carriageway and must not obstruct pavements or cause other adverse public realm impacts.</p>	
		<p>F) Planning applications for uses that require coach parking ancillary to another use will not be permitted where the coach parking would give rise to adverse impacts on road safety and congestion. Coach parking must be provided on-site, unless the applicant can identify an alternative location which satisfies the Council in terms of road safety and congestion and other relevant planning matters. Such locations must not be directly outside the main entrance of developments and must not be at the expense of space provided to facilitate other sustainable modes of transport including buses.</p>	
		<p>Accessible Parking</p> <p>G) Accessible parking spaces must be provided based on 10% of the total residential units/bedspaces proposed (for residential proposals); or one accessible parking space per 33 employees (for employment development). For other uses, the number of accessible spaces must be proportionate to the number of building users. Spaces will only be made available for Blue Badge holders who live or work in the development linked to the parking space. The Council will require accessible parking spaces to be located on-street and identified on plan. The cost of provision of parking spaces will be secured by a Section 106 legal agreement to enable the Council to install the accessible parking spaces as and when demand materialises from Blue Badge occupiers/employees. Spaces will generally not be required to be physically provided where this demand has not materialised.</p>	
		<p>Car Clubs</p> <p>H) The Council will support the provision of car clubs, including the provision of accessible car club parking spaces and/or contributions towards the provision of car clubs in the vicinity of</p>	

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		<p>the development, where appropriate. Car club vehicles must be 'clean', i.e. it must be powered by alternative fuels to minimise harmful impacts on the environment.</p> <p>Car Parks</p> <p>I) Proposals for, or including, new public car parks (and other motor vehicle public parking, including for coaches) will be refused. Redevelopment of existing car parks is strongly encouraged. Proposals for the redevelopment of existing car parks (public or private) for a different use will be subject to the car-free restriction within this policy. The artificial separation of sites to remove existing on-site parking areas (public or private) from the boundary of an application for the purposes of retaining car parking spaces will not be considered acceptable. All parking related to the existing use and/or building which is the subject of the application must be included as part of the application site.</p> <p>Electric Vehicles</p> <p>J) Electric vehicles are not exempt from the car-free policy. However, the Council will require the provision of on-street charging points for vehicles where any parking is provided.</p>	
<b>T4</b>	<b>Public Realm</b>	<p>A) All development proposals must engage positively with the public realm and must ensure that the public realm:</p> <ul style="list-style-type: none"> <li>i. is permeable, legible and designed with regard to pedestrian and cycle desire lines;</li> <li>ii. provides for the safety and convenience of all users, including those with mobility, sensory and or cognitive impairments;</li> <li>iii. increases natural surveillance, including through the provision of adequate lighting;</li> <li>iv. contributes to the quality and quantity of green infrastructure; and</li> <li>v. promotes positive behaviours and social activities and encourages a diverse range of users to make use of space and facilities available.</li> </ul> <p>B) Any remodelling of the public realm and/or streets, through a stand-alone proposal or as part of a wider development proposal, must be based on a contextual appraisal and the findings of a Route:Place analysis. All proposals must be designed in accordance with the Streetbook SPD and must maximise opportunities to deliver other policy objectives.</p> <p>C) Street surface material(s) must:</p> <ul style="list-style-type: none"> <li>i. be durable and non-slip in all weather conditions;</li> <li>ii. be permeable to avoid exacerbating flood risk;</li> <li>iii. be contextual and reflect and enhance the character of particular areas; and</li> <li>iv. enhance the quality of the surrounding architecture.</li> </ul> <p>D) Privately Owned Public Spaces (POPS) must provide a detailed management plan which sets out how the space will be used and managed. Management plans must detail how the space can be utilised by a range of users; and how the space contributes to mixed and balanced communities. POPS must operate indistinguishably from public space. Adherence to management plans will be secured through legal agreement.</p> <p>E) Free, publicly available provision of unisex accessible toilet, baby change and drinking water facilities should be provided within easy reach of any new or enhanced public realm where users are encouraged to dwell.</p>	<p>The proposals seek to connect to the existing and proposed cycle routes within the vicinity of the Site. In addition, the development includes a number of public realm improvements, such as creating new access points to the Site and car-free routes through the Site, which will enhance connectivity, permeability and environment for cyclists.</p> <p>Public toilets are not included within the development.</p>

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		<p>F) Design of the public realm must take into account Hostile Vehicle Mitigation measures, ensuring that the correct level of protection is provided without imposing unnecessary restrictions on people using the public realm in the area</p>	
<p><b>T5</b></p>	<p><b>Delivery, servicing and construction</b></p>	<p>A) Delivery and Servicing Plans will be required for developments that may impact on the operation of the public highway, private roads, the public realm and/or the amenity of residents and businesses, by virtue of likely vehicle movements. These plans must demonstrate how safe, clean and efficient deliveries and servicing has been facilitated and any potential impacts will be mitigated. Delivery and Servicing Plans will be required to assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system. Use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips is encouraged.</p> <p>B) Proposed delivery and servicing arrangements must:</p> <ul style="list-style-type: none"> <li>i. be provided off street wherever feasible, particularly for commercial developments over 200sqm GEA;</li> <li>ii. make optimal use of development sites;</li> <li>iii. demonstrate that servicing and delivery vehicles can enter and exit the site in forward gear;</li> <li>iv. submit sufficient information detailing the delivery and servicing needs of developments, including demonstration that all likely adverse impacts have been thoroughly assessed and mitigated/prevented. This includes impact on the amenity of local residents and businesses, for example, vehicle noise impacts from idling and reversing warning mechanisms and impacts due to the size of delivery vehicles;</li> <li>v. provide delivery and servicing bays whose use is strictly controlled, clearly signed and only used for the specific agreed purpose;</li> <li>vi. ensure that there are no adverse impacts on existing/proposed refuse and recycling facilities;</li> <li>vii. Ensure that the cumulative impact on sustainable transport modes is identified and suitably mitigated/prevented; this must include consideration of delivery and servicing requirements of existing, planned and potential development in the area, particularly in Town Centres, designated employment areas and the CAZ; and</li> <li>viii. Investigate potential for delivery and servicing by non-motorised sustainable modes, such as cargo cycles and 'clean' vehicles.</li> </ul> <p>C) Proposals for uses which generate deliveries to end customers as part of their operation (for example, retail and restaurants) must prioritise non-motorised sustainable modes of transport. Such proposals are required to robustly demonstrate that all options for non-motorised sustainable modes, such as cargo cycles have been fully explored and have been maximised before exploring motorised modes. Following this, 'clean' vehicles (such as electric vehicles) should be used unless there are exceptional reasons why this is not possible.</p>	<p>The development seeks to facilitate safe, clean and efficient deliveries and servicing. Appropriate servicing provision is provided across the development. Further detail is set out in the Transport Assessment, Delivery and Servicing Plan and Waste Management Plan.</p>

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		<p>D) Development proposals in the vicinity of, or located on key routes connecting to, Locally Significant Industrial Sites must demonstrate that they have considered any impacts on logistics and transport movements that are integral to the continued industrial function of these areas.</p> <p>E) Proposals within LSISs and other development incorporating vehicle usage as an integral part of industrial operations should facilitate sustainable freight movement, including demonstrating opportunities to maximise use of more sustainable, non-motorised modes of transport, including for deliveries and servicing.</p> <p>F) Where on street servicing is provided, details must be submitted to demonstrate the need for on street provision and that off street provision is not practical, and to show arrangements will be safe and will not cause traffic obstruction or nuisance. This may require specific traffic modelling.</p> <p>G) Major residential developments must demonstrate that adequate provision can be made for delivery vehicles servicing residents. Delivery storage facilities must be provided such as secure unattended or concierge managed delivery facilities.</p> <p>H) Development proposals – particularly major developments or any other site which may cause disruption during its construction - must adhere to best practice construction techniques to limit impacts on air quality and reduce noise and vibrations from construction and the transportation of construction waste. Information must be provided to identify and mitigate impacts, including a Construction Logistics Plan.</p>	
<b>Chapter 8 – Design and Heritage</b>			
<b>DH1</b>	<b>Fostering Innovation and Conserving and Enhancing the Historic Environment</b>	<p>A) Islington supports innovative approaches to development as a means to increasing development capacity to meet identified needs, while simultaneously addressing any adverse heritage impacts and protecting and enhancing the unique character of the borough. In this context, an innovative approach is one that contributes to the delivery of the Local Plan objectives, including making the borough an inclusive and resilient place by ensuring the design of buildings meets contemporary standards, the needs of all users and mitigates against the impacts of climate change.</p> <p>B) Islington is a diverse place of many different areas which give the borough its character. Development can be accommodated throughout the borough, but the scale of development is dependent on a number of considerations, including design and heritage. The Council intends to develop design codes for some parts of the borough to provide clear design guidance for development in those areas.</p> <p>C) All views – the Mayor’s strategic views, local views and views of local landmarks – must be protected and enhanced.</p>	<p>The development contributes to the delivery of the Draft Local Plan objectives, has been designed in accordance with the principles of inclusive design and resilience, mitigates against the impacts of climate change and protects surrounding heritage assets and character.</p> <p>The design of the development has sought to respond to the principles set out in the Holloway Prison Site SPD, and to design policies at a local, regional and national level.</p> <p>The Site lies within the viewing corridor of two LBI protected views:</p> <ul style="list-style-type: none"> <li>• Local View 4, Archway Road to St Paul’s Cathedral</li> <li>• Local View 5, Archway Bridge to St Paul’s Cathedral</li> </ul>

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			<p>The scheme has been shown in townscape views and with illustrative views over the course of pre-application discussions with officers. A 3D printed model of the scheme has also been shown to Officers and Members.</p> <p>The planning application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment which fully assesses the impact of the development on the local views.</p> <p>The Site is not located within the Protected Vista of a designated London View Management Framework.</p>
		<p>D) The Council will conserve or enhance Islington's heritage assets - both designated and non-designated - and their settings in a manner appropriate to their significance, including listed buildings, conservation areas, scheduled monuments, Archaeological Priority Areas, historic green spaces, locally listed buildings and locally significant shopfronts.</p>	<p>are no designated archaeological heritage assets such as Scheduled Monuments within 0.5km of the Site. The nearest Scheduled Monument to the Site is located more than 2.5km from the Site.</p> <p>There are no statutorily listed buildings or locally listed buildings within the Site. There are four listed buildings within 250m of the Site including the Grade II Listed St Luke's Church, Verger's Cottage, former Baptist Church and no. 23 Carleton Road. There are also a number of locally listed buildings in the vicinity of the Site.</p> <p>The Site does not lie within a Conservation Area, however, is within 20m of Hillmarton Conservation Area (which lies to the south, south-west, east and north-east of the Site) and within 50m of Tufnell Park Conservation Area (which lies to the west and north-west of the Site). The Hillmarton Conservation Area is characterised by two and three storey Victorian semi-detached and terraced houses and the Tufnell Park Conservation Area is characterised by Edwardian and Victorian three storey housing.</p>

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			<p>The Site is not within a designated Archaeological Priority Area (APA) as defined by the LBI. Notwithstanding this, the application is accompanied by a Historic Environment Assessment prepared by Mola. This confirms that the development is unlikely to have a significant effect on heritage assets of archaeological interest.</p> <p>The planning application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment.</p>
		E) Site potential for development and site density levels must be fully optimised, in order to make the best use of the scarce land resource in the borough. High density does not automatically mean buildings need to be tall. The design of development must create a human scale and massing.	The development has been designed in accordance with London Plan Policy D3 and Islington draft Local Plan Policy DH1 and has sought to optimise the development capacity of the Site.
		F) Tall buildings can help make best use of land by optimising the amount of development on a site, but they can also have significant adverse impacts due to their scale, massing and various associated impacts. Tall building locations must be carefully managed and restricted to specific sites where their impacts can be managed through appropriate design.	The development includes buildings over 30m (thereby qualifying as a tall building). An assessment against Draft Policy DH3 is included in Section 7 of the Planning Statement.
		G) Basement development can contribute to accommodating needs, for instance growing families, but they can also have significant adverse impacts. Any development involving basements will be strictly controlled.	The development does not include basement development.
		H) The agent-of-change principle ensures that the individual/organisation proposing change is responsible for ensuring that existing uses in the area are not adversely impacted, including through noise and vibration impacts. This principle will apply to all development proposals in the borough, and can include consideration of a wide range of planning issues, including compatibility of land uses and design.	The development has been designed in accordance with the agent-of-change principles, and a Noise Assessment accompanies the application submission.
<b>DH2</b>	<b>Heritage Assets</b>	<p>A) Planning and listed building consent applications must include a Heritage Statement which demonstrates a clear understanding of the significance of any heritage assets affected by the proposals, including any contribution to significance made by their setting; and assesses the potential impact on significance arising from the proposals. Heritage Statements must be informed by specialist heritage advice and must include sufficient information to allow full assessment of development proposals.</p> <p>Conservation Areas</p> <p>B) Development within conservation areas and their settings – including alterations to existing buildings and new development - must conserve or enhance the significance of the area, and must be of a high quality contextual design. Proposals that harm the significance of a conservation area must provide clear and convincing justification for the harm; where proposals will cause substantial harm to the significance of a conservation area, they will be strongly resisted.</p>	<p>The development provides a series of spaces throughout the Site which will be well-designed, safe, accessible, inclusive, attractive and well-connected within and outside of the Site, relate to the local and historic context of the Site, and which are easy to understand, service and maintain.</p> <p>There are no designated archaeological heritage assets such as Scheduled Monuments within 0.5km of the Site. The nearest Scheduled Monument to the Site is located more than 2.5km from the Site.</p>

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		<p>C) Buildings, spaces, street patterns, views and vistas, uses and trees which contribute to the significance of a conservation area must be retained. The significance of a conservation area can be harmed over time by the cumulative impact arising from the loss of these elements which may individually make a limited positive contribution, but cumulatively have a greater positive contribution.</p>	<p>There are no statutorily listed buildings or locally listed buildings within the Site. There are four listed buildings within 250m of the Site including the Grade II Listed St Luke's Church, Verger's Cottage, former Baptist Church and no. 23 Carleton Road.</p>
		<p>Listed Buildings D) Proposals that harm the significance of a listed building (through inappropriate repair, alteration, extension, demolition and/or development within its setting) must provide clear and convincing justification for the harm. Substantial harm to, or loss of, a listed building will be strongly resisted.</p>	<p>There are also a number of locally listed buildings in the vicinity of the Site.</p>
		<p>Historic Green Spaces E) Islington's historic green spaces are important heritage assets and are listed in Appendix 7. Proposals which affect the significance of historic green spaces must ensure:</p> <ul style="list-style-type: none"> <li>i. the conservation or enhancement of the spaces themselves, their setting and any important features;</li> <li>ii. that the enjoyment, layout, design, character, appearance or setting of spaces, and key views out from the landscape, is maintained or enhanced; and</li> <li>iii. that any planned or potential future restoration is not prejudiced. The Council encourages the restoration and management of historic green spaces to enhance their value.</li> </ul>	<p>The Site does not lie within a Conservation Area, however, is within 20m of Hillmarton Conservation Area (which lies to the south, south-west, east and north-east of the Site) and within 50m of Tufnell Park Conservation Area (which lies to the west and north-west of the Site). The Hillmarton Conservation Area is characterised by two and three storey Victorian semi-detached and terraced houses and the Tufnell Park Conservation Area is characterised by Edwardian and Victorian three storey housing.</p>
		<p>F) Proposals that harm the significance of a historic green space must provide clear and convincing justification for the harm. Where proposals will cause substantial harm to their significance, they will be strongly resisted.</p>	<p>The Site is not within a designated Archaeological Priority Area (APA) as defined by the LBI. Notwithstanding this, the application is accompanied by a Historic Environment Assessment prepared by Mola. This confirms that the development is unlikely to have a significant effect on heritage assets of archaeological interest.</p>
		<p>Archaeology G) Islington's Archaeological Priority Areas and scheduled monuments are identified on the Policies Map. Proposals which have the potential to affect archaeological remains and/or heritage assets of archaeological interest, particularly those within Archaeological Priority Areas and/or in proximity to scheduled monuments, are required to include an Archaeological Assessment and, where necessary Field Evaluation.</p>	<p>The planning application is accompanied by a Townscape, Visual and Above Ground Built Heritage Assessment.</p>
		<p>H) Important archaeological remains must be retained in situ. Substantial harm to, or loss of, nationally important archaeological remains will be strongly resisted. Where this cannot be achieved measures must be taken to mitigate the impact of proposals through archaeological fieldwork to investigate and record remains in advance of works, and subsequent analysis, publication and dissemination of the findings. Where appropriate, public benefits should be sought by revealing and/or interpreting archaeological discoveries.</p>	<p>The residential units have been designed to the highest design quality, taking into account the surrounding development context.</p>
		<p>Non-designated heritage assets I) Non-designated heritage assets, including locally listed buildings and shopfronts, must be identified early in the design process for any development proposal which may impact on their significance. The Council will encourage the retention, repair and re-use of non-</p>	<p>The development does include buildings above 30m (thereby qualifying as a tall building). The proposal has therefore been fully assessed against London Plan Policy D9 and Islington Draft Local Plan Policy DH3.</p>



Policy	Policy Title	LBI Draft Local Plan	Assessment
		<p>designated heritage assets. Proposals that unjustifiably harm the significance of a non-designated heritage asset or their setting will generally not be permitted.</p> <p>Views</p> <p>J) There are a number of strategic views, local views and views of local landmarks within and across Islington. These give important views toward St. Paul's Cathedral, while some offer a unique panoramic view of Islington and other parts of London or a view of St. Paul's or a local landmark as part of the broader townscape (particularly street level views). All views – strategic, local and local landmarks – must be protected and enhanced. Proposals involving the redevelopment of buildings that currently adversely impact a protected view must take all reasonable steps to enhance the view and remove any existing infringement on the view. Development proposals must provide appropriate supporting material – including 3D modelling - to verify the visual impact of development on protected views.</p> <p>Heritage at Risk</p> <p>K) Where development proposals involve 'at risk' heritage assets, opportunities must be sought to address the negative factors which contribute to the 'at risk' status.</p> <p>L) Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset will not be taken into account in any decision.</p>	<p>The proposals have sought to maximise the number of dual aspect homes, and where this has not been achieved, they are as a result of optimising the site capacity as required by London Plan Policy D3.</p>
<b>DH3</b>	<b>Building Heights</b>	<p>A) Buildings of more than 30 metres, or those that are more than twice the contextual reference height of surrounding context (whichever is the lesser) will be considered to be tall buildings.</p> <p>B) Buildings of more than 30 metres are only acceptable in-principle:</p> <ul style="list-style-type: none"> <li>i. on sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or</li> <li>ii. within specific sites identified in a Spatial Strategy area.</li> </ul> <p>C) Each relevant allocation and/or Spatial Strategy area policy identifies the maximum permissible heights (in metres) suitable on the respective sites/locations. Any buildings proposed on these sites which exceed the identified maximum heights will be refused. Proposals for buildings of more than 30 metres are only acceptable where they fully satisfy the criteria identified in Part F.</p> <p>D) Proposals for buildings which are more than twice the contextual reference height of surrounding buildings, but less than 30 metres, must fully satisfy criteria identified in Part F.</p> <p>E) Buildings that do not meet the criteria in Part A but which are still considered prominent in their surrounding context must respond appropriately to local contextual building heights, the character of the area and other relevant policies, and may be subject to Part F of this policy.</p> <p>F) Tall buildings must be high quality in accordance with policy PLAN1. Designs for tall buildings must consider the individual and cumulative visual, functional, and environmental impacts, avoid negative impacts through good design, and mitigate any remaining negative impacts as far as possible. The following criteria must be fully satisfied:</p> <p><b>Visual Impact</b></p>	<p>The development includes buildings over 30m (thereby qualifying as a tall building). An assessment against Draft Policy DH3 is included in Section 7 of the Planning Statement.</p>



Policy	Policy Title	LBI Draft Local Plan	Assessment
		<p>i) Protect the legibility and identity of the area by creating a positive landmark within the townscape and creating a strong sense of place;</p> <p>ii) Protect and enhance strategic and local views, and views to local landmarks;</p> <p>iii) Conserve and seek to enhance the significance of designated and non designated heritage assets and their settings, relative to their respective significance;</p> <p>iv) Be proportionate and compatible to their surroundings and the character of the area;</p> <p>v) Promote exceptional design, through high quality design details and material, positively contribute to the skyline and to the immediate locality, and having regard to any site-specific design principles set out in the relevant site allocations and/or Spatial Strategy area policy, and other relevant design policies</p> <p>vi) Provide an appropriate transition from the taller section of a building to the lower volume relating to the streetscape and surrounding context and ensuring a human scale street level experience;</p> <p><b>Functional Impact</b></p> <p>vii) Not prejudice the ongoing functionality, amenity or operation of sites in the local area; and/or the development potential of sites in the local area, taking into account the individual impact of the proposal and cumulative impacts of existing and permitted development in the area (all development not just tall buildings);</p> <p>viii) Ensure that impacts on the levels of daylight and sunlight – both into and between proposed buildings and for adjoining land or properties - are fully assessed and found to be acceptable; and that unacceptable overshadowing is prevented;</p> <p>ix) Demonstrate how the building will operate and function to provide good levels of amenity for all building users, through provision of a detailed building management plan which details how the proposed building will operate in various circumstances, including emergency procedures. Plans must include information on peak time ingress and egress and the interaction with local and strategic infrastructure; delivery and servicing; vertical transportation; waste arrangements; emergency escape routes and other relevant building services;</p> <p><b>Environmental Impact</b></p> <p>x) Promote exceptional sustainable design standards;</p> <p>xi) Demonstrate that development does not adversely impact, either individually or cumulatively, on the microclimate of the surrounding area, including the proposal site and any public space in close proximity to the site. This may require submission of detailed assessments and/or modelling work; and</p> <p>xii) Demonstrate that development does not have any adverse individual or cumulative impacts on biodiversity, including watercourses and water bodies and their hydrology</p>	
DH4	Basement Development	The Development does not propose basement accommodation and therefore this draft policy is not relevant to the development.	

Policy	Policy Title	LBI Draft Local Plan	Assessment
DH5	<b>Agent-of-change, noise and vibration</b>	A) Proposals for any new development – new build, extensions and conversions – in proximity to an existing use(s) which may be adversely impacted by the new use must follow the agent-of-change principle.	<p>The development has been considered with due regard to existing noise generating activities or uses on the new noise-sensitive parts of the development. The Site is bounded to the north, west and south by residential properties. These are not considered significant sources of air pollution and/or noise and vibration.</p> <p>There are non-residential uses located on Camden / Parkhurst Road and we do not consider the development will have an impact on these established non-residential uses.</p> <p>The development is largely residential, with some commercial floorspace proposed and a Women’s Building. The non-residential elements proposed have been designed to limit the impact on the existing and proposed residential properties through and includes mitigation. The planning application is accompanied by a Noise Assessment.</p>
		B) Any potential adverse impacts which may arise due to new development being located close to sensitive uses must be fully prevented via the design/layout of a scheme and/or the incorporation of other appropriate measures to limit the impact.	
		C) If adverse impacts cannot be fully prevented, then proposals will normally be refused, unless non-physical measures - such as a Deed of Easement - are put in place which, in the Council’s view, would ensure there is no residual threat to the future operation of the existing use.	
		D) All development proposals which have the potential to cause or exacerbate unacceptable noise and vibration impacts on land uses and occupiers in the locality must fully assess such impacts, with reference to relevant noise thresholds set out in Appendix 2. All proposals must: <ul style="list-style-type: none"> <li>i. in the first instance, aim to prevent noise and vibration impacts occurring by siting uses which could cause or exacerbate impacts away from potentially affected uses; or, vice versa, siting sensitive uses away from uses which could cause noise and vibration impacts. An Acoustic Design Statement, in line with Appendix 2, must be provided to demonstrate satisfactory solutions; or</li> <li>ii. where this is not possible, provide a detailed assessment of noise and vibration impacts in line with Appendix 2. Where noise and/or vibration impacts are identified suitable mitigation measures must be put in place to reduce these impacts, through the proposed layout (including the interaction of non-residential and residential uses in mixed use developments), design and materials. If impacts cannot be mitigated, planning permission will be refused.</li> </ul>	
		E) A Noise Management Plan will be required where mitigation of noise from behavioural sources is necessary.	
DH6	<b>Advertisements</b>	This draft policy is not relevant to the development.	
DH7	<b>Shopfronts</b>	This draft policy is not relevant to the development.	
DH8	<b>Public Art</b>	A) Provision of high quality public art is encouraged as part of new development, where this does not constrain other higher priority Local Plan policies and objectives.	Peabody have commissioned a legacy project with Islington’s Heritage Team to ensure the history and legacy of the Holloway Prison are recorded for the benefit of future generations and to enable initial ideas to be put forward of ways the history can be reflected through public art within the development.
		B) All new public art must: <ul style="list-style-type: none"> <li>i. be developed in consultation with the community in which it is located;</li> <li>ii. protect and enhance local character;</li> <li>iii. ensure that it does not compromise the delivery of sustainability or inclusive design policy objectives;</li> <li>iv. be site specific in terms of the design and concept;</li> <li>v. be visible and able to be enjoyed from a publicly accessible location; and</li> <li>vi. require minimal maintenance and (where necessary) decommissioning works.</li> </ul>	

Policy	Policy Title	LBI Draft Local Plan	Assessment
ST1	Infrastructure Planning and Smarter City Approach	This draft policy is not relevant to the development.	
ST2	Waste	A) Development proposals must provide waste and recycling facilities which: <ul style="list-style-type: none"> <li>i. fit current and future collection practices and targets;</li> <li>ii. are accessible to all;</li> <li>iii. are designed to provide convenient access for all people, helping to support people to recycle; and</li> <li>iv. provide high quality storage and collection systems in line with Council guidance.</li> </ul>	The development provides the necessary waste and recycling facilities for the proposed uses. This is detailed within the Waste Management Plan, prepared by WSP.
		B)	This part of the draft policy is not relevant to the proposals.
		C)	This part of the draft policy is not relevant to the proposals.
ST3	Telecommunications, communications and utilities equipment	This draft policy is not relevant to the development.	
ST4	Water and wastewater Infrastructure	A) Adequate water and wastewater infrastructure must be provided to serve all new developments. Applicants are encouraged to engage with relevant water/wastewater companies at the earliest possible opportunity, ideally at preapplication stage, to establish any potential water and wastewater network reinforcement requirements.	It is expected that here will be adequate water and wastewater infrastructure available to serve the development.
		B) Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where: <ul style="list-style-type: none"> <li>i. sufficient capacity already exists; or</li> <li>ii. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected.</li> </ul>	
		C) When there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds the appropriate improvements to cater for the development. Any improvements must be completed prior to occupation of the relevant phase of development; this will be secured by planning condition.	

# **Appendix V**

## **Assessment against the Mayor's Housing SPG Standards (2016)**

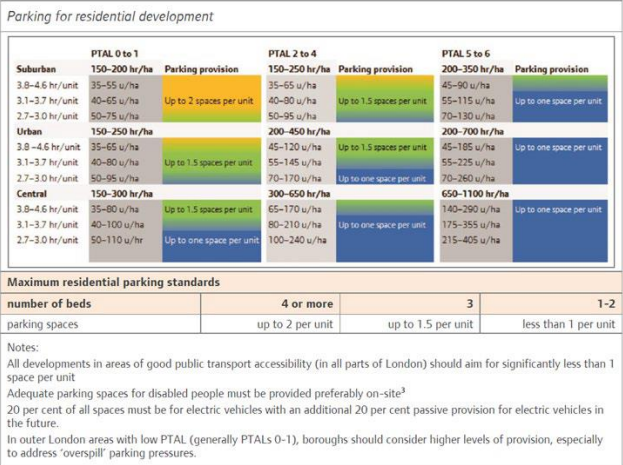
# Former Holloway Prison

## Assessment against the Mayor’s Housing SPG Standards (2016)

Standard	Mayor’s Housing SPG (2016)	Assessment
1	<p>Development proposals should demonstrate:</p> <ul style="list-style-type: none"> <li>a) How the design responds to its physical context, including the character and legibility of the area and the local pattern of building, public space, landscape and topography.</li> <li>b) How the scheme relates to the identified character of the place, to the local vision and strategy or how bolder change is justified in relation to a coherent set of ideas for the place expressed in the local vision and strategy or agreed locally</li> </ul>	<p>As this application’s Design and Access Statement (DAS) confirms, the proposed design of the development has evolved from the pre-application consultation process and is considered to respond to the characteristics and context of the Site.</p> <p>The DAS describes how the proposals have been developed in response to detailed analysis of the context with respect to the character of the area and the local pattern of buildings, public space, landscape, and topography. The accompanying Open Space and Recreation Assessment and Landscape Design Strategy also provides details on the type and quality of new public amenity and streets that will be provided.</p>
2	<p>Development proposals should demonstrate:</p> <ul style="list-style-type: none"> <li>a) How the scheme complements the local network of public spaces, including how it integrates with existing streets and paths.</li> <li>b) How public spaces and pedestrian routes are designed to be overlooked and safe, and blank elevations onto the public realm at ground floor have been avoided.</li> <li>c) For larger developments, how any new public spaces including streets and paths are designed on the basis of an understanding of the planned role and character of these spaces within the local movement network, and how new spaces relate to the local vision and strategy for the area.</li> </ul>	<p>Landscaping has been central to the proposed design and The development incorporates a series of open spaces including:</p> <ul style="list-style-type: none"> <li>• Public Garden –a central public open space at the heart of The development</li> <li>• Nature Garden –a public open space north-west of Plot A</li> <li>• Trecastle Connection – a public pedestrian and cycle connection that lies adjacent to Plot E that leads onto Trecastle Way</li> <li>• Women’s Garden – this garden specifically serves the Women’s Building in Plot C</li> <li>• Communal Resident Gardens – a series of communal gardens which serve the residents of Plot A, Plot B, Plot D and Plot E respectively</li> <li>• Extra Care Garden – a garden specifically serving the 60 Extra Care homes in Plot E</li> <li>• Rooftop Gardens – these are a series of communal gardens at roof level which serve the residents of the relevant cores which have access to the space. No playspace is included at roof level</li> </ul>

Standard	Mayor's Housing SPG (2016)	Assessment
		<p>The development provides publicly accessible open space and public realm. These spaces have been designed to complement and link into the wider context.</p> <p>The proposed publicly accessible open space, public realm and routes and connections are designed to be overlooked and safe, and how blank elevations onto the public realm at ground floor have been avoided. The development includes active frontages surrounding the public realm to define the space and provide natural surveillance.</p>
3	<p>Development proposals should demonstrate that they comply with the LPAs' open space strategies, ensuring that an audit of surrounding open space is undertaken and that where appropriate, opportunities to help address a deficiency in provision by providing new public open spaces are taken forward in the design process.</p>	<p>As per the LBI Policy Matrix, The development provides publicly accessible open space. The Open Space and Recreation Assessment and Landscape Design Strategy which accompanies this planning application includes an analysis of the surrounding open space and provides details of the new public open space which is proposed which is linked to surrounding areas to create a network of open space.</p>
4	<p>Where communal open space is provided, development proposals should demonstrate that the space: is overlooked by surrounding development; is accessible disabled people including people who require level access and wheelchair users; is designed to take advantage of direct sunlight; has suitable management arrangements in place.</p>	<p>The development includes a series of communal gardens which serve the residents of Plot A, Plot B, Plot D and Plot E respectively. There are numerous new homes facing onto these spaces to ensure they are overlooked; have been designed to be accessible to disabled people (including wheelchair users); and have been designed taking into account daylight sunlight analysis. Further details regarding maintenance and management is included in the Open Space and Recreation Assessment and Landscape Design Strategy.</p>
5 (and Policy 3.6)	<p>For developments with an estimated occupancy of ten children or more, development proposals should make appropriate play provision in accordance with the Mayor's Play and Informal Recreation SPG.</p>	<p>As outlined in this application's Open Space and Recreation Assessment and Landscape Design Strategy, the development has made appropriate play provision of child play space in accordance with the Mayor's Play and Informal Recreation SPG. All play space is proposed at ground and first floor level and no play space is proposed at roof level.</p>
6 (and Policy 3.4)	<p>Development proposals should demonstrate how the density of residential accommodation satisfies London Plan policy relating to public transport access levels (PTALs) and the accessibility of local amenities and services, and is appropriate to the location.</p>	<p>The Site is highly accessible by walking, cycling and public transport and has a PTAL rating of 6a ('excellent').</p> <p>The development seeks to make the best use of this highly-accessible, brownfield Site and has followed an iterative design-led process which has informed the quantum of Development. The development proposes 985 residential units, including 60 Extra Care Units, plus a 1,489sqm Women's Building and 1,822sqm of Commercial Floorspace. This is in accordance with the Brownfield Land Register which sets out that the Site has a minimum capacity of 880 new homes.</p> <p>The Site is an important source of housing in the borough given that The development comprises the redevelopment of a surplus public sector owned site which is identified in Policy H4 of the London Plan as being an important source of capacity where housing delivery should be optimised.</p> <p>In order to achieve the optimised site capacity, The development has been sensitively designed to respond to the surrounding local context and site constraints, whilst also protecting the amenity of neighbouring properties and providing a high level of living accommodation for future residents.</p>

Standard	Mayor's Housing SPG (2016)	Assessment
7 (and Policy 3.8)	Development proposals should demonstrate how the mix of dwelling types and sizes and the mix of tenures meet strategic and local need and are appropriate to the location.	The Planning Statement and Design and Access Statement outline the mix of dwelling types and sizes proposed. The proposed residential mix is considered to be appropriate to this site and in line with local and London Plan policy objectives to create balanced and mixed communities, whilst maximising the density and development potential of sites in sustainable locations.
8	All main entrances to houses, ground floor flats and communal entrance lobbies should be visible, clearly identifiable, and directly accessible from the public realm.	The DAS outlines how the communal entrances to all blocks are clearly visible and are directly accessible from the public realm.
9	The distance from the accessible car parking space of standard 18 to the home or to the relevant block entrance or lift core should be kept to a minimum and should be preferably level or where level is not possible, gently sloping (1:60 – 1:20) on a suitable ground surface.	The scheme complies with the required accessibility standards and distances from the accessible car parking space to block entrance is a maximum of 50m in accordance with LBI policy.
10	Active frontages should be maximised and inactive frontages minimised on the ground floor of buildings facing publicly accessible space, in order to provide natural surveillance and activity.	The DAS identifies how the proposed commercial units will front onto Parkhurst Road in order to activate this street. The Women's Building located within Plot C provides further activation at ground floor level. In addition, communal spaces to Plot D and E are located to ground floor to provide activation within the Site and natural surveillance, including onto the proposed Public Garden (public park).
11	90 per cent of new build housing should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation requirement M4(3) 'wheelchair user dwellings'.	The development will deliver 12% M4(3) wheelchair accessible provision by unit number across the scheme. The remaining units will be M4(2).
12	Each core should be accessible to generally no more than eight units on each floor.	There is a maximum of 8 units per core in all blocks, apart from the Extra Care Units which have 12 units per core. This core is generously sized to promote interaction between residents and benefits from natural daylight.
13	An access core serving 4 or more dwellings should provide an access control system with entry phones in all dwellings linked to a main front door with electronic lock release. Unless a 24 hour concierge is provided, additional security measures including audio-visual verification to the access control system should be provided where any of the following apply: more than 25 dwellings are served by one core, or the potential occupancy of the dwellings served by one core exceeds 100 bed spaces, or more than 8 dwellings are provided per floor.	Details of the access control system is included within the Design and Access Statement.
14	Where dwellings are accessed via an internal corridor, the corridor should receive natural light and adequate ventilation where possible.	The corridors have been designed to receive natural light and ventilation where possible.
15	All dwellings entered at the seventh floor (eighth storey) and above should be served by at least two lifts.	Each residential core will provide at least two lifts to serve the seventh floor and above.
16	It is desirable that every wheelchair user dwelling is served by more than one lift.	Each residential core is served by two residential lifts. As a result, every wheelchair user dwelling is served by more than one lift.

Standard	Mayor's Housing SPG (2016)	Assessment																								
17	<p>The maximum car parking standards set out below should be the basis for considering planning applications</p>  <p><i>Parking for residential development</i></p> <table border="1"> <thead> <tr> <th></th> <th>PTAL 0 to 1</th> <th>PTAL 2 to 4</th> <th>PTAL 5 to 6</th> </tr> </thead> <tbody> <tr> <td><b>Suburban</b></td> <td>150-200 hr/ha 35-55 u/ha 3.8-4.6 hr/unit 3.1-3.7 hr/unit 2.7-3.0 hr/unit</td> <td>150-250 hr/ha 35-65 u/ha 40-80 u/ha 50-95 u/ha</td> <td>200-350 hr/ha 45-90 u/ha 55-115 u/ha 70-130 u/ha</td> </tr> <tr> <td><b>Urban</b></td> <td>150-250 hr/ha 35-65 u/ha 40-80 u/ha 50-95 u/ha</td> <td>200-450 hr/ha 45-120 u/ha 55-145 u/ha 70-170 u/ha</td> <td>200-700 hr/ha 45-185 u/ha 55-225 u/ha 70-260 u/ha</td> </tr> <tr> <td><b>Central</b></td> <td>150-300 hr/ha 35-80 u/ha 40-100 u/ha 50-110 u/ha</td> <td>300-650 hr/ha 65-170 u/ha 80-210 u/ha 100-240 u/ha</td> <td>650-1100 hr/ha 140-290 u/ha 175-355 u/ha 215-405 u/ha</td> </tr> </tbody> </table> <p><b>Maximum residential parking standards</b></p> <table border="1"> <thead> <tr> <th>number of beds</th> <th>4 or more</th> <th>3</th> <th>1-2</th> </tr> </thead> <tbody> <tr> <td>parking spaces</td> <td>up to 2 per unit</td> <td>up to 1.5 per unit</td> <td>less than 1 per unit</td> </tr> </tbody> </table> <p>Notes:                      All developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit.                      Adequate parking spaces for disabled people must be provided preferably on-site<sup>3</sup>                      20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.                      In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address 'overspill' parking pressures.</p>		PTAL 0 to 1	PTAL 2 to 4	PTAL 5 to 6	<b>Suburban</b>	150-200 hr/ha 35-55 u/ha 3.8-4.6 hr/unit 3.1-3.7 hr/unit 2.7-3.0 hr/unit	150-250 hr/ha 35-65 u/ha 40-80 u/ha 50-95 u/ha	200-350 hr/ha 45-90 u/ha 55-115 u/ha 70-130 u/ha	<b>Urban</b>	150-250 hr/ha 35-65 u/ha 40-80 u/ha 50-95 u/ha	200-450 hr/ha 45-120 u/ha 55-145 u/ha 70-170 u/ha	200-700 hr/ha 45-185 u/ha 55-225 u/ha 70-260 u/ha	<b>Central</b>	150-300 hr/ha 35-80 u/ha 40-100 u/ha 50-110 u/ha	300-650 hr/ha 65-170 u/ha 80-210 u/ha 100-240 u/ha	650-1100 hr/ha 140-290 u/ha 175-355 u/ha 215-405 u/ha	number of beds	4 or more	3	1-2	parking spaces	up to 2 per unit	up to 1.5 per unit	less than 1 per unit	<p>Given the highly accessible nature of the Site, The development is proposed as car-free with the provision of Blue Badge parking spaces only. For 3% of residential units, one Blue Badge parking space per unit will be provided. With respect to additional parking spaces, to provide up to 10% of residential units with a Blue Badge parking space, Peabody has agreed to a financial contribution of £2,000 per space not provided on-site. This accords with LBI's Planning Obligations (Section 106) SPD (2016).</p>
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18	<p>Each designated wheelchair accessible dwelling should have a car parking space that complies with Part M4 (3).</p>	<p>As above, for 3% of residential units, one Blue Badge parking space per unit will be provided. With respect to additional parking spaces, to provide up to 10% of residential units with a Blue Badge parking space, Peabody has agreed to a financial contribution of £2,000 per space not provided on-site. This accords with LBI's Planning Obligations (Section 106) SPD (2016).</p>																								
19	<p>Careful consideration should be given to the siting and organisation of car parking within an overall design for open space so that car parking does not negatively affect the use and appearance of open spaces.</p>	<p>The location of the Blue Badge parking spaces has been carefully considered in order to ensure that this does not negatively impact the use and appearance of the new open spaces. The overall landscaping approach has been based on reducing cars, prioritising people and encouraging active travel modes. The width of the internal road has been kept to a minimum.</p>																								
20 (Policy 6.9)	<p>All developments should provide dedicated storage space for cycles at the following level:</p> <ul style="list-style-type: none"> <li>1 per studio and one bed</li> <li>2 per all other dwellings.</li> </ul> <p>In addition, one short stay cycle parking space should be provided per 40 units.</p>	<p>The development includes cycle parking for all uses in line with the latest cycle parking requirements set out in Policy T5 of the London Plan.</p>																								
21	<p>Individual or communal cycle storage outside the home should be secure, sheltered and adequately lit, with convenient access to the street. Where cycle storage is provided within the home, it should be in addition to the minimum GIA and minimum storage and circulation space</p>	<p>Cycle stands for the residential units will be located in a secure store within each of the residential cores and has been designed in accordance with LCDS and includes provision for accessible cycle parking spaces. Separate cycle parking spaces are provided for the non-residential elements of the development.</p>																								



Standard	Mayor's Housing SPG (2016)	Assessment
	requirements. Cycle storage identified in habitable rooms or on balconies will not be considered acceptable.	
22	Communal refuse and recycling containers, communal bin enclosures and refuse and recycling stores should be easily accessible to all residents including children and wheelchair users, and located on a hard, level surface. The location should satisfy local requirements for waste collection. Refuse and recycling stores within buildings should be located to limit the nuisance caused by noise and smells and maintained to a high hygiene standard.	The DAS and Waste Management Plan submitted with the planning application include details of the refuse and recycling facilities provided. All proposed residential and commercial waste storage facilities are easily accessible to all residents, including children and wheelchair users. The stores also satisfy local requirements and British Standard BS5906:2005 Code of Practice for waste collection and will be maintained to limit noise / smell.
23	Storage facilities for waste and recycling containers should be provided in accordance with local authority requirements and meeting at least British Standard BS5906:2005 Code of Practice for waste management in Buildings.	All proposed residential and commercial waste storage facilities have been designed to satisfy local requirements and British Standard BS5906:2005 Code of Practice for waste collection.
24	All new dwellings should meet the nationally described space standard.	As the DAS outlines, all residential units and their individual room sizes, levels of storage provision and floor/ceiling heights have been designed to comply with the requirements of the National Space Standards and London Plan requirements.
25	Dwelling plans should demonstrate that dwellings will accommodate the furniture, access and activity space requirements relating to the declared level of occupancy and the furniture schedule set out in Approved Document Part M.	In accordance with the DAS and submitted drawings, the plans demonstrate the dwellings will accommodate the furniture, access and activity space requirements relating to the declared level of occupancy and the furniture schedule set out in Approved Document Part M.
26	A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant.	All residential units are provided with private external amenity space, in the form of gardens or balconies, which meets or exceeds the requirements of Standard 26.
27	The minimum depth and width for all balconies and other private external spaces should be 1500mm.	All residential units are provided with private external amenity space, in the form of gardens or balconies, which meets or exceeds the requirements of Standard 27.
28	Design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces	The DAS and submitted drawings for this application shows how the proposed dwellings are provided with an adequate level of privacy in relation to the neighbouring property, the street and other public spaces.
29	Developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided	The layout of the development has sought to minimise single aspect units, and where these are proposed, they are as a result of optimising the site capacity as required by Policy D3. All such single aspect units will achieve adequate levels of passive ventilation, daylight, privacy and will avoid overheating. No three-bedroom single aspect dwellings are proposed.
30 (and Policy 7.15)	The layout of adjacent dwellings and the location of lifts and circulation spaces should seek to limit the transmission of noise to sound sensitive rooms within dwellings.	The layout of adjacent dwellings and the location of lifts and circulation spaces have been designed to limit the transmission of noise to sound sensitive rooms within dwellings where possible.
31	A minimum ceiling height of 2.5 metres for at least 75% of the gross internal area is strongly encouraged.	All units have a minimum ceiling height in excess of 2.5m.

Standard	Mayor's Housing SPG (2016)	Assessment						
32	All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.	The submitted plans and Daylight and Sunlight Assessment demonstrates that all units receive direct sunlight to enter at least one habitable room for part of the day.						
33 (and policy 7.14)	Minimise increased exposure to existing poor air quality and make provision to address local problems of air quality: be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).	The application is accompanied by an Air Quality Assessment.						
34 (and Policy 5.3)	All homes should satisfy London Plan policy on sustainable design and construction and make the fullest contribution to the mitigation of and adaptation to climate change.	The application is accompanied by a Sustainable Design and Construction Statement. This sets out the measures to ensure that the development will deliver an efficient and sustainable scheme, providing a high quality development that accords with the planning policy guidance.						
Standard 35 (and Policy 5.2)	<table border="1" data-bbox="293 619 801 783"> <tr> <td data-bbox="293 619 465 687">Year</td> <td data-bbox="465 619 801 687">Improvement on 2013 Building Regulations</td> </tr> <tr> <td data-bbox="293 687 465 746">2014 - 2016</td> <td data-bbox="465 687 801 746">35 per cent</td> </tr> <tr> <td data-bbox="293 746 465 783">2016 - 2036</td> <td data-bbox="465 746 801 783">Zero carbon</td> </tr> </table> <p data-bbox="824 619 1099 671">carbon dioxide emissions reduction.</p>	Year	Improvement on 2013 Building Regulations	2014 - 2016	35 per cent	2016 - 2036	Zero carbon	The development follows the London Plan energy hierarchy and the submitted Energy Statement demonstrates how the development achieves net zero-carbon, with a minimum on-site reduction that exceeds the minimum required 35% beyond Building Regulations.
Year	Improvement on 2013 Building Regulations							
2014 - 2016	35 per cent							
2016 - 2036	Zero carbon							
Standard 36 (and Policy 5.9)	Development proposals should demonstrate how the design of dwellings will avoid overheating without reliance on energy intensive mechanical cooling systems.	The application includes design measures to mitigate overheating. This is detailed in the application documents, which include an Overheating Assessment appended to the Sustainable Design and Construction Statement.						
37 (and Policy 5.15)	New dwellings should be designed to ensure that a maximum of 105 litres of water is consumed per person per day in line with the optional requirement of Part G.	The proposed Development is designed to the optional requirement of Part G that ensures a maximum of 105 litres of water is consumed per person per day.						
38 (and Policy 5.12)	Where development is permitted in an area at risk of flooding, it should incorporate flood resilient design in accordance with the NPPF and its associated technical Guidance whilst ensuring level access is maintained.	<p data-bbox="1122 1058 2096 1278">The planning application is accompanied by a Flood Risk Assessment (FRA). This confirms that the Site is located in Flood Zone 1 and the risk of flooding due to fluvial, tidal, groundwater and artificial sources has been assessed and is considered to be low. The Site is identified as being at 'low' to 'high' risk of flooding from surface water, however the FRA sets out that as the proposals include significant regrading of land levels and the use of Sustainable Urban Drainage Systems, the risk of flooding to the development is considered to be low.</p> <p data-bbox="1122 1318 2096 1406">The FRA concludes that the development has a low probability of flooding from all sources and the surface water runoff from the Site will not be affected by the development proposals, thereby ensuring that flood risk is not increased elsewhere.</p>						

Standard	Mayor's Housing SPG (2016)	Assessment
39 (and Policies 5.11 & 5.13)	New development should incorporate Sustainable Urban Drainage Systems and green roofs where practical with the aim of achieving a Greenfield run-off rate, increasing bio-diversity and improving water quality. Surface water run-off is to be managed as close to source as possible.	<p>The planning application is accompanied by a Flood Risk Assessment (FRA).</p> <p>The development includes significant regrading of land levels and the use of Sustainable Urban Drainage Systems including permeable paving, green roofs and rain gardens which will be fully incorporated into the landscaping design. Further detail is provided in the Open Space and Recreation Assessment and Landscape Design Strategy. The development has followed the drainage hierarchy and runoff from the Site is proposed to be restricted to greenfield rates for all events up to and including the 1 in 100-year rainfall event in line with planning policy.</p>
Standard 40 (and Policy 7.19)	The design and layout of new residential development should avoid areas of ecological value and seek to enhance the ecological capital of the area in accordance with GLA best practice guidance on biodiversity and nature conservation.	<p>The Site is not designated (statutorily or non-statutorily) for any nature conservation value and the Site predominantly comprises hardstanding, buildings, introduced trees, shrubs, amenity grassland and ephemeral short perennials. The majority of flora species on-Site comprise urban landscape planting. Due to a lack of management since the closure of the prison, much of the Site has remained unmanaged with areas becoming overgrown and vegetation growing in areas of previous hardstanding.</p> <p>The planning application is accompanied by an Ecology Assessment included within the Environmental Statement in order to ensure that the proposals manage impacts on biodiversity and aim to secure net increases in biodiversity gain. The Ecological Assessment includes a series of recommendations in order to enhance and protect the ecological value of the Site. These recommendations have been incorporated into the proposed landscaping scheme and overall design.</p>
41	Developments should manage existing materials, specify sustainable materials that are robust and fit for purpose and secure the sustainable procurement of materials.	The development has been designed in accordance with the principles of the Circular Economy and the Circular Economy Statement includes further detail on the use of sustainable materials.

# **Appendix VI**

## **Assessment against the Draft Good Quality Homes for All Londoners (2020)**

# Former Holloway Prison

## Assessment against the Draft Good Quality Homes for All Londoners (2020)

Policy	Draft Good Quality Housing Guidance (2020)	Assessment
C1.1.1	<p>Development proposals should demonstrate:</p> <ul style="list-style-type: none"> <li>How the design responds to its physical context. This includes the character of the area and the local pattern of buildings, public space, landscape and topography.</li> <li>How the scheme relates to the identified character of the place and to the local vision and strategy. Or, how bolder change is justified in relation to a coherent set of ideas for the place as expressed in the local vision and strategy.</li> </ul>	<p>As this application's Design and Access Statement (DAS) confirms, the proposed design of the development has evolved from the pre-application consultation process and is considered to respond to the characteristics and context of the Site.</p> <p>The DAS describes how the proposals have been developed in response to detailed analysis of the context with respect to the character of the area and the local pattern of buildings, public space, landscape, and topography. The accompanying Open Space and Recreation Assessment and Landscape Design Strategy also provides details on the type and quality of new public amenity and streets that will be provided.</p>
C1.1.2	<p>Development proposals should demonstrate:</p> <ul style="list-style-type: none"> <li>How the scheme complements and links into the local network of public spaces, including how it integrates with existing streets, paths and ecological links.</li> <li>That public spaces and pedestrian routes are designed to be overlooked and safe, and how blank elevations onto the public realm at ground floor have been avoided. For larger developments, how any new public spaces, including streets and paths, are designed on the basis of an understanding of the planned role and character of these spaces within the local movement network, and how new spaces relate to the local vision and strategy for the area.</li> </ul>	<p>The development provides publicly accessible open space and public realm. These spaces have been designed to complement and link into the wider context.</p> <p>The proposed publicly accessible open space, public realm and routes and connections are designed to be overlooked and safe, and how blank elevations onto the public realm at ground floor have been avoided. The development includes active frontages surrounding the public realm to define the space and provide natural surveillance.</p>
C1.2.1	<p>Development proposals should take advantage of any level changes to optimise the full potential of the site. They should also achieve efficient internal and external access arrangements and optimise urban greening</p>	<p>The development takes advantage of, and responds to, level changes across the Site. The development includes significant regrading of land levels and the use of Sustainable Urban Drainage Systems including permeable paving, green roofs and rain gardens which are fully incorporated into the landscaping design.</p>

Policy	Draft Good Quality Housing Guidance (2020)	Assessment
	and sustainable drainage (see C6.2 and C6.3) whilst ensuring an accessible and inclusive scheme in terms of inclusive design (see C2.2).	
C1.3.1	Development proposals should demonstrate how the mix of uses meets strategic and local borough needs.	<p>The development comprises:</p> <ul style="list-style-type: none"> <li>• 985 new residential units (60% of which are affordable), including 60 extra care homes</li> <li>• 1,489sqm Women’s Building</li> <li>• 1,822sqm commercial floorspace</li> </ul> <p>The mix of proposed uses has been the subject of pre-application discussions with LBI to ensure the proposals meet an identified need. The uses also accord with those sought by the Holloway Prison Site SPD.</p>
C1.3.2	Residential proposals should be designed to avoid compromising the day-to-day functioning and long-term viability of adjacent non-residential uses, in accordance with the Agent of Change principle (London Plan Policy D13).	A full assessment against London Plan Policy D13 is included within the London Plan Policy Matrix.
C1.3.3	Development proposals that combine different uses should be designed to protect the quality of home life through careful consideration of noise mitigation, refuse collection, services, parking arrangements and access routes to homes and amenity spaces.	The development has been designed to ensure a high quality of residential amenity and considers noise mitigation, refuse collection, services, parking arrangements and access routes to the homes and amenity space. Further detail is included within the supporting documents that accompany this planning application including in the Noise Impact Assessment, Waste Management Plan, Delivery and Servicing Plan, Transport Assessment, Design and Access Statement and Open Space and Recreation Assessment and Landscape Design Strategy.
C1.4.1	Development proposals should demonstrate that they comply with the borough’s open space strategies and policies. They should ensure that an analysis of surrounding open space is undertaken and that opportunities to address a deficiency in provision by providing new public open spaces, or creating links between networks of open space, are taken forward in the design process.	As per the LBI Policy Matrix, the development provides publicly accessible open space. The Open Space and Recreation Assessment and Landscape Design Strategy which accompanies this planning application includes an analysis of the surrounding open space and provides details of the new public open space which is proposed which is linked to surrounding areas to create a network of open space.
C1.4.2	For developments where 10 or more children and young people are expected to live, development proposals should make appropriate play and informal recreation provision in accordance with London Plan Policy S4. The GLA Population Yield Calculator should be used to calculate the expected number of children and young people likely to live in the development. Children’s play space should be designed to be stimulating and incorporate greenery, be overlooked to enable passive surveillance, be accessible to all tenures and be safely accessed from the street by children and young people independently.	<p>The development includes 5,292sqm of play space. This quantum is based on 10sqm per child and the number of children and age split calculated with the GLA’s Population Yield calculator based on the scheme mix and tenure of the residential units. This excludes the 60 Extra Care homes as these homes will be subject to an occupancy age restriction and will therefore not generate child occupants. A copy of the child yield calculator is included within the Open Space and Recreation Assessment and Landscape Design Strategy prepared by Exterior Architecture which accompanies this planning application. The play space:</p> <ol style="list-style-type: none"> <li>a. Provides a stimulating environment with a wide range of play opportunities for different age groups</li> </ol>

Policy	Draft Good Quality Housing Guidance (2020)	Assessment
		<ul style="list-style-type: none"> <li>b. Is located so that it can be accessed by children and young people independently and the scheme utilises safe and enclosed communal gardens for provision of additional play opportunities. 100% of the play space is provided at ground and first floor level. There is no play provision proposed at roof level.</li> <li>c. The play space is integral to the proposed Development and surrounding neighbourhood. This includes a large, public 'destination' play area at the heart of the site for all ages and abilities which will be publicly accessible.</li> <li>d. The play strategy is integrated into the overall landscaping scheme which utilises existing trees and proposes a significant number of new trees and other forms of greenery</li> <li>e. The play provision has been designed and located to enable passive surveillance. The scheme includes space for teenagers and young adults which are activated, sufficiently lit, and well overlooked</li> <li>f. The play provision is not segregated by tenure.</li> </ul>
C1.4.3	Where communal open space is provided, development proposals should demonstrate that the space meets the qualitative design aspects identified in London Plan Policy D6 (Table 3.2)	A full assessment of the development against London Plan Policy D6 is included in the London Plan Policy Matrix. This demonstrates that The development has been designed in accordance with the relevant criteria.
C2.1.1	Development proposals should demonstrate how the mix of dwelling sizes and the mix of tenures meet strategic and local borough targets, and how they are appropriate for their location in London.	The housing mix of the proposed development, as set out in the accommodation schedule which accompanies the planning application, has sought to provide a mix that responds to LBI Draft Local Plan Table 3.2 which is based on the latest housing need evidence. The development also responds to advice from LBI's Housing Team regarding the social rent mix that the greatest need is for 2- and 3-bedroom social rent accommodation.
C2.1.2	Development proposals should demonstrate that housing of different types and tenures in a scheme have been fully integrated, and that the quality of architecture and materials is consistent across all tenures.	<p>The development comprises 985 new homes, 60% of which will be genuinely affordable with the following tenure split:</p> <ul style="list-style-type: none"> <li>• 70% low cost rented units (social rent units with rents set at Target Rent levels)</li> <li>• 30% intermediate units (London Shared Ownership)</li> </ul> <p>The different types and tenures of housing have been fully integrated into the scheme and the development has been designed as tenure blind with respect to quality of architecture and materials.</p>
C2.2.1	Development proposals should demonstrate how they have been designed to meet the needs of a diverse population, including disabled people, older people and families with young children, in terms of wider site arrangements, adopting an inclusive design approach, and the provision of accessible housing, in the form of both accessible and adaptable housing and wheelchair user dwellings.	<p>The development accords with the principles of Inclusive Design and has been designed to cater for a range of people including younger people, older people and people with young children, as well as people with other protected characteristics. The development includes the following characteristics:</p> <ul style="list-style-type: none"> <li>• The development includes a range of residential accommodation offering different types, sizes and tenure of units, including 60% affordable housing</li> </ul>

Policy	Draft Good Quality Housing Guidance (2020)	Assessment
		<ul style="list-style-type: none"> <li>• The development proposes 60 Extra-Care Units specifically designed for Older People.</li> <li>• The development includes 12% wheelchair accessible units (M4(3)) and has been designed to cater for people with differing levels of mobility</li> <li>• The development also includes a large amount of play space to cater for different age groups integrated into the landscaping scheme through a series of publicly accessible and communal gardens.</li> <li>• The development also includes a Women’s Building. The facility incorporates safe space to support women in the criminal justice system and services for women. The Women’s Building provides an active frontage on Parkhurst Road and Plot C has been designed to provide a celebratory, open, and inviting frontage. Internally, the Women’s Building has been designed flexibly to enable the space to meet the needs of future operators.</li> </ul> <p>Further detail is included within the Design and Access Statement. The application is also accompanied by a Equality Impact Assessment.</p>
C2.2.2	Development proposals should demonstrate how they have been designed to accommodate the travel needs of disabled residents, including through designing inclusive street environments and access to public transport networks, and the provision of disabled persons car parking.	The landscaping approach has been based on reducing cars, prioritising people (including disabled people) and encouraging active travel modes. The development is ‘car-free’ with car parking limited to disabled car parking spaces. The development includes provision of a new pedestrian and cycle connection to Trecastle Way. The development includes an internal residential street which provides vehicular and cycle access. Further detail on Inclusive Access is included within the Design and Access Statement.
C2.3.1	Development proposals should include an appropriate range of housing types and tenures to provide opportunities for people to remain within their community as their lives evolve.	The development comprises 985 new residential units, including 60 Extra Care Units which have been designed specifically for older people to allow people to remain in their own homes for longer. These are located within Block E1 and have been designed in accordance with Policy H13 of the London Plan.
C2.3.2	Development proposals should demonstrate that meaningful engagement has taken place with existing communities from the early design stage in order to help define specific community needs and aid with any integration of new communities.	Peabody entered into a PPA with London Borough Islington (LBI) in 2019 and has engaged in extensive pre-application discussions since this time, including with LBI and the GLA, Islington Design Review Panel, Members, as well as a comprehensive public consultation and stakeholder engagement. Further detail of this is included in the Design and Access Statement.
C3.1.1	Development proposals should ensure that all main entrances to houses, ground floor flats and communal entrance lobbies are visible from the public realm and clearly identified.	As detailed in the Design and Access Statement and on the proposed plans, main entrances to residential units will be from the public realm or within communal gardens and clearly identified.
C3.1.2	Development proposals should ensure that the number of dwellings accessed from a single core does not exceed eight per floor. Deviation (by exception) from this requirement will need to be justified and mitigated by	There is a maximum of 8 units per core in all blocks, apart from the Extra Care Units which have 12 units per core. This core is generously sized to promote interaction between residents and benefits from natural daylight.



Policy	Draft Good Quality Housing Guidance (2020)	Assessment
	maximising corridor widths (beyond 1500mm) and introducing natural ventilation/daylight to corridors.	
C3.1.3	Development proposals should ensure that communal refuse, recycling and food waste containers, communal bin enclosures and refuse stores are easily accessible to and usable by all residents including children and disabled people, and located on a hard, level surface. The location should satisfy local requirements for waste collection and, if within buildings, should be positioned to limit the nuisance cause by noise and smells, and provided with means for cleaning.	The planning application is accompanied by an Waste Management Plan, prepared by WSP, which sets out the proposed refuse strategy for The development. This has been designed in accordance with LBI requirements for waste collection. Each residential dwelling provides adequate and easily accessible storage space for the collection of refuse, recycling, and food waste. The communal bin stores are easily accessible to and usable by all residents including children and disabled people.
C3.2.1	Development proposals should demonstrate that they are safe and secure, and that they design out opportunities for crime and anti-social behaviour.	The proposed scheme has been designed in accordance with the Building Regulations Part Q as detailed in the Design and Access Statement and following advice of the Met Police Designing Out Crime Officer received at pre-application stage.
C3.2.2	Development proposals should demonstrate that they achieve the highest standards of fire safety, identify unobstructed outside space for fire appliances which is also appropriate for use as an evacuation assembly point, and provide suitable and convenient means of escape and an associated evacuation strategy for all building users.	The planning application is accompanied by a Fire Statement which accords with London Plan Policy D12 and the Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021.
C3.3.1	Residential development should provide dedicated long-stay parking space for cycles in accordance with the London Plan and guidance in the London Cycling Design Standards: <ul style="list-style-type: none"> <li>• One long-stay space per studio or one bedroom (one-person) dwelling</li> <li>• One and a half long-stay spaces per one bedroom (two-person) dwelling</li> <li>• Two long-stay spaces per two or more bedroom dwelling.</li> </ul> In addition, for developments of between 5 and 40 dwellings at least two short-stay cycle parking spaces should also be provided, with at least one additional space per 40 dwellings thereafter	The proposed Development will provide cycle parking provision, for both the residential units and community use, in line with the standards required in the London Plan and includes provision for larger cycles, including adapted cycles for disabled people. The cycle parking proposed will be designed and laid out in accordance with the London Cycling Design Standards.  For the residential element, 80 per cent of cycle parking is two-tier cycle parking whilst 20 per cent is accessible cycle parking for people with non-standard bicycles and those that struggle to use two-tier systems. Of these, 75 per cent will be Sheffield stands and 25 per cent will be Sheffield stands with increased space (i.e., for cargo bikes, hand cranked bikes, trailers, buggies, tandems and tricycles). The accessible cycle parking spaces will be conveniently located to the building entrances. The short stay cycle parking for all uses will be provided within the public realm in the form of Sheffield stands. Further detail of the specification of racks and access will be included within the Transport Assessment which accompanies the planning application.
C3.3.2	In line with the London Cycling Design Standards, cycle parking should be conveniently located, secure and accessible. Communal cycle stores should have an appropriate mix of stand types and adequate spacing and facilities for larger cycles. In some instances, it may be appropriate for cycle parking to be provided within individual homes, but it should be fully accessible and provided in addition to minimum space requirements and not in habitable rooms or on balconies.	For the Extra Care Units, the proposals provide secure cycle storage at lower ground floor level. The scheme has been designed to comply with the cycle rates set out in Policy T5 of the London Plan.
C3.4.1	Residential development should conform to London Plan maximum residential parking standards as set out in Table 10.3 of Policy T6.1 (below)	

Policy	Draft Good Quality Housing Guidance (2020)	Assessment
C3.4.2	Careful consideration should be given to the location and organisation of car parking within an overall design so that car parking does not create barriers to walking, cycling and public transport use or negatively affect the use and appearance of open spaces.	The landscaping approach has been based on reducing cars, prioritising people, and encouraging active travel modes. The development is 'car-free' with car parking limited to disabled car parking spaces.
C4.1.1	All housing developments should meet the minimum floor space standards set out in Table 3.1 of the London Plan.	All residential dwellings meet or exceed minimum floor space standards as set out in Table 3.1 of the London Plan.
C4.1.2	A one bedspace, single bedroom must have a floor area of at least 7.5 sqm and be at least 2.15m wide. A two bedspace, double (or twin) bedroom must have a floor area of at least 11.5 sqm.	The residential units have been designed in accordance with the criteria in C4.1.2 and following the advice of GLA Planning and Design Officers.
C4.1.3	Wheelchair user dwellings should meet the design requirements set out in Approved Document M volume 1, M4(3)	The development includes 12% wheelchair accessible units which have been designed in accordance with M4(3).
C4.1.4	Dwelling plans should demonstrate that dwelling types provide flexibility by allowing for an alternative seating arrangement in living rooms and by accommodating double or twin beds in at least one double bedroom.	This is demonstrated on the planning application drawings.
C4.2.1	A minimum of 5 sqm of private outside space should be provided for one-to-two person dwellings and an extra 1 sqm should be provided for each additional occupant.	All residential dwellings have access to private external amenity space which meets or exceeds the minimum space standards, including in terms of width and depth.
C4.2.2	The minimum depth and width of all balconies and other private external spaces is 1500mm.	
C4.3.1	Development proposals should create well-considered layout arrangements within dwellings that improve the lived experience through generosity of floor-to-ceiling heights, and spatial arrangements that optimise quality of outlook and aspect.	All homes have a floor to ceiling height of 2.6m and the spatial arrangement seeks to optimise the quality of outlook and aspect. The number of dual aspect homes has been maximised.
C4.3.2	The minimum floor-to-ceiling height in habitable rooms is 2.5m between finished floor level and finished ceiling level.	All units have a minimum ceiling height of 2.6m.
C5.1.1	Design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of visual and acoustic privacy in relation to neighbouring property, the street and other public spaces.	All homes are provided within an adequate level of visual and acoustic privacy in relation to neighbouring properties, the street and other public spaces. This is demonstrated within the Design and Access Statement.
C5.1.2	The layout of adjacent dwellings and the location of lifts and circulation spaces should seek to limit the transmission of noise to sound-sensitive rooms within dwellings.	The layout of the proposed units, internally and in relation to communal elements within each building, has been carefully developed and is considered to provide an appropriate quality of accommodation for future occupiers.
C5.2.1	All new dwellings should be dual aspect, unless there are exceptional circumstances that justify the inclusion of any single-aspect homes. Single-aspect dwellings that are north facing, contain three or more bedrooms, or are exposed to noise levels with significant adverse effects on health and quality of life, should not be permitted.	The layout of the development has sought to minimise single aspect units, achieving over 90% dual aspect unit. Where single aspect units are proposed, these are as a result of optimising the site capacity as required by Policy D3. All such single aspect units will achieve adequate levels of passive ventilation, daylight, privacy and will avoid

Policy	Draft Good Quality Housing Guidance (2020)	Assessment
C5.2.2	Where single-aspect dwellings are proposed (by exception), the design team should demonstrate how good levels of ventilation, daylight, privacy and thermal comfort will be provided to each habitable room and the kitchen.	overheating. This is set out in the accompanying Daylight Sunlight assessment and Thermal Comfort Assessment.
C5.3.1	New dwellings should achieve a minimum average daylight factor (ADF) target value of 1 per cent for a bedroom and 1.5 per cent for a living room.	The planning application is accompanied by a Daylight Sunlight Assessment which assesses the scheme in line with the testing methods set out in the BRE Guidance.
C5.3.2	Proposed development should maximise quality and availability of sunlight and natural light in outdoor spaces, particularly in winter. Outdoor spaces should benefit from at least two hours of daylight on 21st March into 50 per cent of space in line with BRE guidance.	
C5.3.3	All homes must provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.	
C5.4.1	Development proposals should be located and designed to reduce the accumulation of indoor air pollutants and exposure of residents to air pollution	The planning application is accompanied by an air quality assessment which sets out how the development seeks to minimise air pollution.
C5.4.2	Development proposals should be located - or attenuation measures should be introduced - to reduce the exposure of residents to noise pollution.	The planning application is accompanied by a Noise Assessment which details measures to mitigate against noise pollution.
C5.5.1	Careful building design (including thermal mass, layout, aspect, shading, window size, glazing specification and ventilation), and landscaping and green infrastructure should be used to ensure good internal thermal comfort and avoid the need for active cooling.	The application includes design measures to mitigate overheating. This is detailed in the application documents, which include an Overheating Assessment appended to the Sustainable Design and Construction Statement.
C6.1.1	Development proposals should be designed in accordance with the Mayor's energy hierarchy to achieve the Mayor's Net Zero Carbon Homes policy. This means being Lean (energy efficient), Clean (exploit local energy sources and connect to heat networks), Green (maximise on-site renewables) and Seen (monitor, verify and report on energy performance).	The development follows the London Plan energy hierarchy and the submitted Energy Statement demonstrates how the development achieves net zero-carbon, with a minimum on-site reduction that exceeds the minimum required 35% beyond Building Regulations.
C6.1.2	Referable development proposals should calculate and reduce whole life-cycle carbon emissions, which includes the embodied carbon in construction, by using fewer materials and low-carbon materials. Other development proposals are encouraged to do this too.	The planning application is accompanied by a Whole-Life Cycle Carbon Assessment which calculates and sets out measures to reduce whole-life cycle carbon emissions.
C6.1.3	Development proposals should be designed so that water fittings and appliances consume no more than 105 litres per person per day (plus up to five litres for external water consumption). Opportunities for water reuse (to reduce potable water consumption should be identified.	The development achieves water consumption levels in of 105 litres or less per head per day and will achieve the required BREEAM, and water measures required by criterion C.2 and C.3. The development will not lead to harm to the water environment, and suitable foul and surface water networks are created.
C6.2.1	Major developments should meet relevant borough Urban Greening Factor target scores, or where none exist, the interim scores set out in the London Plan.	The development achieves an Urban Greening Factor in excess of 0.4
C6.2.2	Development proposals should contribute to a net gain in biodiversity	The development secures a biodiversity net gain.

Policy	Draft Good Quality Housing Guidance (2020)	Assessment
C6.2.3	Small site developments should demonstrate no net loss of green cover.	This policy is not relevant to the proposals.
C6.3.1	Where development in areas at risk from flooding is permitted, homes should make space for water and aim for development to be set back from the banks of watercourses and be designed to incorporate flood resistance and resilience measures.	<p>The planning application is accompanied by a Flood Risk Assessment (FRA). This confirms that the Site is located in Flood Zone 1 and the risk of flooding due to fluvial, tidal, groundwater and artificial sources has been assessed and is considered to be low. The Site is identified as being at 'low' to 'high' risk of flooding from surface water, however the FRA sets out that as the proposals include significant regrading of land levels and the use of Sustainable Urban Drainage Systems, the risk of flooding to the development is considered to be low.</p> <p>The FRA concludes that the development has a low probability of flooding from all sources and the surface water runoff from the Site will not be affected by the development proposals, thereby ensuring that flood risk is not increased elsewhere.</p>
C6.3.2	New development should incorporate sustainable drainage systems (SuDS) in line with the drainage hierarchy.	The development incorporates SuDS in line with the drainage hierarchy including permeable paving, green roofs and rain gardens.
C6.4.1	The development of large-scale redevelopment areas (i.e. Opportunity Areas) should consider how local air quality can be improved as part of an air quality positive approach. All other development should be at least Air Quality Neutral. Air Quality Assessments should be submitted with all major developments.	The planning application is accompanied by an Air Quality Assessment which considers how local air quality can be improved as part of the development.
C7.1.1	Buildings should be retained and refurbished where practicable. New buildings should be designed in ways that ensure they are adaptable - including to climate change - and capable of conversion to different uses.	The development has been designed to adapt to changing climate, flood requirements and make efficient use of water. The layout of the development will avoid contributions to the urban heat island effect. Furthermore, the development comprises 1,822sqm commercial floorspace (Use Class E) which has been designed flexibly to accommodate a range of uses.
C7.1.2	Buildings should be designed to support the circular economy, including for disassembly, allowing for the reuse of materials and products, reducing waste and pollution.	The development has been designed in accordance with the principles of the Circular Economy and the planning application is accompanied by a Circular Economy Statement which sets out measures including allowing for the reuse of materials and products, reducing waste and pollution.
C7.2.1	The development of a site should not prejudice the development of adjoining land or buildings, including subsequent phases of development.	The development does not prejudice the development of adjoining land or buildings.
C7.3.1	Development proposals should be designed to take full account of future maintenance practicalities and likely costs.	Detail of the future maintenance and management of buildings is included in the Design and Access Statement, and of open spaces is set out in the Open Space and Recreation Assessment and Landscape Design Strategy.

# **Appendix VII**

## **Assessment against Holloway Prison Site SPD (2018)**

# Former Holloway Prison

## Assessment against Holloway Prison Site SPD (2018)

Key Considerations	Assessment
The provision of housing and in particular maximising affordable housing to meet identified housing needs in the borough.	The development includes 985 new homes of which 60% are affordable, therefore representing a significant contribution to housing delivering in this location which optimises the use of a brownfield site.
The provision of a women's building/centre that incorporates safe space to support women in the criminal justice system and services for women as part of a wider building that could also include affordable workspace to support local organisations and employment opportunities.	The development provides a 1,489sqm Women's Building (Use Class F.2) split across the lower and upper ground floors of Plot C, fronting Parkhurst Road. The Women's Building provides an active frontage on Parkhurst Road and Plot C has been designed to provide a celebratory, open, and inviting frontage. Internally, the Women's Building has been designed flexibly to enable the space to meet the needs of future operators. Indicative internal layouts are shown in the Design and Access Statement, prepared by AHMM Architects which accompanies this application submission. The Women's Building is served by a dedicated and secure garden.
Active uses along Parkhurst Road and Camden Road, which could include, for example, a small amount of retail provision.	The development provides 1,822sqm of flexible commercial floorspace (Use Class E) located to the lower and upper ground floors of Plot B fronting Parkhurst Road, and the ground floor of Plot C fronting the Public Garden. The commercial floorspace is split across a range of unit sizes. The Plot B commercial floorspace provides an active frontage to Parkhurst Road, complementing the active frontage provided by the Women's Building, located to Plot C. The commercial unit to Plot C fronts the Public Garden and provides activation to the public open space, complementing the active frontage provided by the residents' facilities located to the ground floor of Plot D.
Improvements to local infrastructure to support population growth, for example, health facilities and public transport.	The development is CIL liable and the CIL receipt can be spent by LBI on necessary projects they identify. In addition, the development will secure improvements to the existing pedestrian crossing to Camden/Parkhurst Road.
The provision of publicly accessible open green space including play space as part of a design that protects and enhances biodiversity, retains existing trees and provides high quality landscaping.	<p>Landscaping has been central to the proposed design and the development incorporates a series of open spaces including:</p> <ul style="list-style-type: none"> <li>• Public Garden – a central public open space at the heart of the Development</li> <li>• Nature Garden – a public open space north-west of Plot A</li> <li>• Trecastle Connection – a public pedestrian and cycle connection that lies adjacent to Plot E that leads onto Trecastle Way</li> <li>• Women's Garden – this garden specifically serves the Women's Building in Plot C</li> </ul>

	<ul style="list-style-type: none"> <li>• Communal Resident Gardens – a series of communal gardens which serve the residents of Plot A, Plot B, Plot D and Plot E respectively</li> <li>• Extra Care Garden – a garden specifically serving the 60 Extra Care homes in Plot E</li> <li>• Rooftop Gardens – these are a series of communal gardens at roof level which serve the residents of the relevant core with direct access to roof level. No playspace is included at roof level</li> </ul> <p>Furthermore, the site layout has been designed with the aim of retaining as many of the most visually significant trees as possible. The proposals also include a substantial net gain in the number of trees and canopy cover for the site, with 364 new trees. A net gain in biodiversity is secured.</p>
<p>High quality design that responds to the site's context and constraints and makes a positive contribution to the local character of the area.</p>	<p>The scheme responds to the site's context and makes a positive contribution to the local character of the area.</p>
<p>The connection of the site to the surrounding neighbourhood, increasing the site's permeability, promoting walking and cycling.</p>	<p>The proposals seek to connect to the existing and proposed cycle routes within the vicinity of the Site. In addition, the proposed development includes a number of public realm improvements, such as creating new access points to the Site and car-free routes through the Site, which will enhance connectivity, permeability, and environment for cyclists.</p>
<p>The provision of an inclusive environment which is accessible, invites people into the site, and facilitates community cohesion.</p>	<p>The development accords with the principles of Inclusive Design and has been designed to cater for a range of people including younger people, older people and people with young children, as well as people with other protected characteristics. The Development includes the following characteristics:</p> <ul style="list-style-type: none"> <li>• The Development includes a range of residential accommodation offering different types, sizes and tenure of units, including 60% affordable housing</li> <li>• The Development proposes 60 Extra-Care Units specifically designed for Older People.</li> <li>• The Development includes 12% wheelchair accessible units (M4(3)) and has been designed to cater for people with differing levels of mobility</li> <li>• The Development also includes a large amount of play space to cater for different age groups integrated into the landscaping scheme through a series of publicly accessible and communal gardens.</li> <li>• The development also includes a Women's Building. The facility incorporates safe space to support women in the criminal justice system and services for women. The Women's Building provides an active frontage on Parkhurst Road and Plot C has been designed to provide a celebratory, open, and inviting frontage. Internally, the Women's Building has been designed flexibly to enable the space to meet the needs of future operators.</li> </ul> <p>Further detail is included within the Design and Access Statement. The application is also accompanied by a Equality Impact Assessment.</p>
<p>The achievement of best practice sustainability standards, including the provision of an energy centre.</p>	<p>The development is inherently sustainable and has been designed to achieve the best practice sustainability standards as demonstrated in the Sustainable Design and Construction Statement which accompanies this planning application. A single energy centre is not considered the most appropriate infrastructure to serve the development as set out in the Sustainable Design and Construction Statement.</p> <p>The development follows the London Plan energy hierarchy and the submitted Energy Statement demonstrates how the development achieves net zero-carbon, with a minimum on-site reduction that exceeds the minimum required 35% beyond Building Regulations.</p>

# Contact Details

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